

B.1.1



State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny
Secretary

BOX 7921
MADISON, WISCONSIN 53707

January 22, 1986

IN REPLY REFER TO: 4430

Mr. Charles Slaustas - Wis. Permitting Unit
U.S. EPA - 5 HS/JCK/12
230 South Dearborn Street
Chicago, IL 60604

RE: Hazardous Waste Part B Permit for Kimberly Clark - Development
Facility North
EPA ID No: WID 000808444

Dear Mr. Slaustas:

This letter is to transmit to you the draft Part B RCRA permit, statement of basis, and public notice at the above referenced facility located at 1111 S. Henry St., Neenah, Wisconsin by the Bureau of Solid Waste Management.

The technical review staff for this facility is Rick Krueger. This submittal was prepared by Rick Krueger.

Should you have any questions regarding the review and status of the application, contact the above mentioned staff at (608) 266-5425, or myself at 608/266-0833.

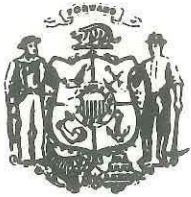
Sincerely,
Bureau of Solid Waste Management

Rich O'Hara

Richard E. O'Hara, Chief
Hazardous Waste Management Section

REO:RK:cls
6804T

cc: Systems Management Section
Wisconsin State Specialist - U.S. EPA - Region V - S. Buthman
Ed Lynch - SW/3
Jim Reyburn - Lake Michigan District
Tony Holaska - U.S. EPA Region V - 5HS/JCK/12



State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny
Secretary

BOX 7921
MADISON, WISCONSIN 53707

January 21, 1986

IN REPLY REFER TO: 4430

Mr. Chuck Slaustas - U.S. EPA
Wisconsin Permitting Unit - 5HS/JCK/12
230 South Dearborn Street
Chicago, IL 60604

RECEIVED

JAN 23 1986

SOLID WASTE BRANCH
U.S. EPA, REGION V

RE: Hazardous Waste Facility Part B Application
Facility EPA ID No.: WID 000808444
Facility Name: Kimberly Clark - Development Facility North
Facility Address: 1111 S. Henry Street
Neenah, WI 54946

Dear Mr. Slaustas:

The hazardous waste Part B application and correspondence for the above referenced facility have been reviewed for technical adequacy by the Bureau of Solid Waste Management. Based on this review, the Department has determined that the Part B Application does contain sufficient information required by RCRA necessary to prepare the facility's RCRA permit. Additional information may be required by the Department if it is found necessary during preparation of the permit.

Should you have any questions regarding this determination, feel free to contact Rick Krueger at (608) 266-5425 or Jim Reyburn at (414) 497-4397.

Sincerely,
Bureau of Solid Waste Management

Richard E. O'Hara

Richard E. O'Hara, Chief
Hazardous Waste Management Section

REO:db
6466V

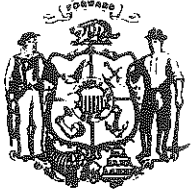
cc: Systems Management Section - SW/3
Ed Lynch - SW/3
Jim Reyburn - Lake Michigan District
Wisconsin State Specialist - U.S. EPA - 5HW/13 - S. Butzman
Tony Holaska - U.S. EPA, Region V

RECEIVED

JAN 28 1986

SOLID WASTE BRANCH
U.S. EPA, REGION V

COPY 2



State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny
Secretary

BOX 7921

MADISON, WISCONSIN 53707

December 4, 1985

IN REPLY REFER TO: 4430

SOLID WASTE DIVISION
U.S. EPA REGION 5

Mr. Charles Slaustas, USEPA 5HS-13
Wisconsin/Minnesota Permitting Unit
230 South Dearborn Street
Chicago, IL 60604

RE: Hazardous Waste Facility Part B Application
Facility EPA ID No.: WID 000808444
Facility Name: Kimberly Clark, Development Facility North
Facility Address: 111 South Henry Street
Neenah, WI 54956

Dear Mr. Slaustas:

The revised hazardous waste Part B application and correspondence for the above referenced facility have been reviewed for technical adequacy by the Bureau of Solid Waste Management. Based on this review, the Department has determined that the Part B Application does not contain sufficient technical information. In order to complete the processing of the Part B application, the information specified in the enclosure must be submitted.

This letter does not recommend denial of the Part B Application but indicates that additional technical information is necessary to complete the review. Submittal of this information does not insure approval nor does it preclude the Department from recommending requirement of additional information if the need is demonstrated through a more detailed review.

By copy of this letter Kimberly-Clark Development Facility North is being notified of deficiencies found in their RCRA Part B permit application. The facility's copy therefore serves to notify Development Facility North of these concerns and also inform the facility that it has thirty (30) days to respond to these deficiencies.

Mr. Charles Slaustas - December 4, 1985

2.

If you have any questions regarding the completeness review, please contact Rick Krueger at (608) 266-5425 or Jim Reyburn at (414) 497-4397.

Sincerely,
Bureau of Solid Waste Management

R. E. O'Hara

Richard E. O'Hara, Chief
Hazardous Waste Management Section

REO:cn

Attachments

cc: Systems Management Section
Rick Krueger - SW/3 (w/attachments)
Jim Reyburn - Lake Michigan District (w/attachments)
Susanne Buthman - Wisconsin State Specialist - U.S. EPA - Region V
Tony Holaska - U.S. EPA 5HS-13
John Eckert - Kimberly Clark, Development Facility North (w/attachments)

7892Y

Attachment I

NOTICE OF TECHNICAL INADEQUACY

Kimberly Clark Development Facility North
WID 000808444

All comments must be responded to in letter form explaining each of the responses, and modifying appropriate pages of the permit application where changes are made. Five copies of the response are necessary. Two of these copies must be submitted to the USEPA Region V in Chicago. Three copies must be submitted to the Wisconsin DNR in Madison.

The following information must be submitted:

1. Two storage areas, shown on Figures 1h and 2b1, have been or will be permanently closed. Describe the methods and procedures used to close and decontaminate those storage areas. In addition, the "Certification Regarding Potential Releases" form should be completed and filed with the revised Part B application being sent to the USEPA and Wisconsin DNR. (40 CFR 264.111, 264.112(a)(1), 264.112(a)(3), 264.114, 264.178) See Attachment II.
2. Describe the traffic pattern inside and outside of the main building which is related to the transport of hazardous waste storage drums. Show turns across traffic lanes. Show traffic control signs. Show all gravel or unpaved roads, and indicate that the roads are maintained in good repair. (40 CFR 270.14(b)(10))
(Part B Application pages 6, 10, 10a).
3. Describe the sampling equipment and technique used for each of the four hazardous wastes. Describe the number of samples and the "random" technique used to obtain the composite sample. (40 CFR 264.13(b)(3)).
(Part B Application page 7)
4. Describe the container management practices used in the process areas prior to the waste being placed in the storage areas. (40 CFR 262.34, 264.172, 264.173, 264.174, 264.175, 265.171, 265.172, 265.173, 265.174, 265.176).
(Part B Application page 10)
5. Demonstrate the capability of the secondary containment storage areas to contain liquids. Include a statement that the bases are free of cracks or gaps, and that the bases are impervious to the wastes. (40 CFR 264.175(b)(1))
(Part B Application pages 10 and 11)

6. Indicate the frequency of occurrences when rainwater run-off has entered the drainage tanks below the two storage areas (#1 and #4), and the frequency of pumping out those tanks. Indicate that any liquids collected in the future will be analyzed properly, preferably by GC/MS. Indicate that if the collected liquids are hazardous, they will be disposed of properly.
(40 CFR 264.175(b)(5), 270.15(a)(5))
(Part B Application page 19d)
7. Provide guidelines which will be used by the emergency coordinators to determine when and under what circumstances the contingency plan will be implemented.
(40 CFR 264.52(a), 264.56(d))
(Part B Application page 19g)
8. Describe the procedures for ensuring that all equipment used during implementation of the contingency plan is cleaned and fit for its intended use before normal operations are resumed.
(40 CFR 264.56(h)(2))
(Part B Application page 19i)
9. Describe how the storage area catch basins will be decontaminated or disposed of when closure is completed.
(40 CFR 264.112(a)(3), 264.114)
(Part B Application page 32)
10. Submit an updated financial assurance mechanism for closure and liability insurance which reflects the maximum inventory of forty (40) drums.
(40 CFR 264.143, 264.147)
(Part B Application pages 33, 34, 35, 35b, 36)

7892Y

ATTACHMENT II

CERTIFICATION REGARDING POTENTIAL RELEASES FROM SOLID WASTE MANAGEMENT UNITS

Kimberly Clark Development Facility North
WID 000808444

We are currently reviewing Part B of the Resource Conservation and Recovery Act (RCRA) permit application for the above-referenced facility.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to modify RCRA. Under Section 206 (copy enclosed) of the Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. Please note that both hazardous and nonhazardous waste can meet the definition of solid waste under 40 CFR 261.2.

Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken or will be taken, pursuant to a RCRA permit. An important part of our determination includes your willingness (or unwillingness) to sign the enclosed certification statement. Please read it carefully and either sign it and return it, or return it to us unsigned with a cover letter of explanation, within three weeks of the date of this letter. Any information regarding releases of hazardous waste or hazardous constituents to the environment will be evaluated during the permit review process. Any tentative decision we make concerning your permit application will be public noticed in a newspaper of general circulation in the area of the facility.

7892Y
11/29/85

CERTIFICATION REGARDING POTENTIAL RELEASE FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: _____
EPA I.D. NUMBER: _____
LOCATION CITY: _____
STATE: _____

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN YOUR PART B APPLICATION

	YES	NO
• Landfill	_____	_____
• Surface Impoundment	_____	_____
• Land Farm	_____	_____
• Waste Pile	_____	_____
• Incinerator	_____	_____
• Storage Tank (Above Ground)	_____	_____
• Storage Tank (Underground)	_____	_____
• Container Storage Area	_____	_____
• Injection Wells	_____	_____
• Wastewater Treatment Units	_____	_____
• Transfer Stations	_____	_____
• Waste Recycling Operations	_____	_____
• Waste Treatment, Detoxification	_____	_____
• Other _____	_____	_____

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed on and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

NOTE: Hazardous waste are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII Of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part B application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Typed Name and Title

Signature

Date

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: FEB 25 1985

SUBJECT: Corrective Action Requirements in RCRA Permits

FROM: Karl J. Klepitsch, Jr.
Chief, Solid Waste BranchTO: B.G. Constantelos, Director
Waste Management Division

The Solid Waste Branch has developed the following proposal to address the corrective action requirements of Section 206 of the Hazardous and Solid Waste Amendments of 1984 (the Amendments). Your comments on the certification are incorporated in this revision. This proposal is aimed primarily at permits that have already been drafted.

Section 206 reads, as follows:

"Continuing Releases at Permitted Facilities

Sec. 206. Section 3004 of the Solid Waste Disposal Act is amended by adding the following new subsection after subsection (t) thereof: "(u) CONTINUING RELEASES AT PERMITTED FACILITIES.- Standards promulgated under this section shall require, and a permit issued after the date of enactment of the Hazardous and Solid Waste Amendments of 1984 by the Administrator or a State shall require, corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a permit under this subtitle, regardless of the time at which waste was placed in such unit. Permits issued under section 3005 shall contain schedules of compliance for such corrective action (where such corrective action cannot be completed prior to issuance of the permit) and assurances of financial responsibility for completing such corrective action."

Before presenting our proposal, here are the several assumptions and definitions we have made:

- 1) The Region can make permit issuance decisions in advance of national standards promulgated under Section 3004 of RCRA.
- 2) "Corrective action" is defined as in 40 CFR 264.100.

- 3) "Release" as discussed in the preamble to the codification rule, includes any concentration of an Appendix VIII constituent in excess of the groundwater protection standard where such constituent has emanated from a Solid Waste Management Unit. Releases to surface water or to the air are also included.
- 4) "Solid Waste Management Unit" is defined as any contiguous land, and structures, other appurtenances, and improvements on the land used for storage, treatment, disposal, collection, source separation, transfer, processing, resource recovery or resource conservation of any solid waste (as defined in 40 CFR 261.2).
- 5) "Facility seeking permit" is any interim status facility or any facility authorized to operate as an interim status facility via a compliance order issued §3008.

Facilities that may be "seeking a permit" as mentioned in Section 206 of the Amendments can be divided into five groups with respect to the need for corrective action:

- 1) Those having no Solid Waste Management Units (SWMU) other than those currently in use and for which no releases are thought to have occurred,
- 2) Those that do not know whether or not they have SWMUS other than those currently in use,
- 3) Those that have SWMUS other than those currently in use for which there is no indication of the presence or absence of "releases",
- 4) Those that have SWMUS suspected of or known to have releases (whether in current use, or not), and
- 5) RCRA sites that are also CERCLA sites.

In order to issue previously noticed permits now, we propose that the Region take a different approach for each of the groups:

Group 1 (only current units)

First, the Region will verify the following (in concert with the State):

- a) Is there any visible evidence of "old" SWMU?
- b) Is there any visible evidence of any releases from any units?
- c) Records for any spill notifications.

- d) Does the State have any records of old SWMUS?
- e) Was a CERCLA 8900-1 submitted by or for the site?
- f) Do the air or water programs have any concerns at the site?

Second, secure a certification from the applicants regarding releases (see attachments).

Third, issue a public notice seeking written comments regarding releases or old SWMUS.

Fourth, unless indicated otherwise by one of the above, issue permit without a corrective action condition.

Groups 2 and 3 (no information or insufficient information)

Take no action other than the first and second steps for group 1, until national guidance is available.

Group 4 (known or suspected releases)

First, draft a permit condition to do 40 CFR 264 assessment now to take corrective action as needed, and to establish financial assurance for same. The actual details of a study or corrective action could be contained in a §3008 compliance order.

Second, reissue public notice for this major modification to the draft permits with comment limited to the major modification.

Third, after receipt of comments and opportunity for hearing, consider comments and issue a permit, as appropriate.

Fourth, specifically explain in responsiveness summary that if corrective action is needed, it will result in a major modification, with the attendant opportunity for review and comment.

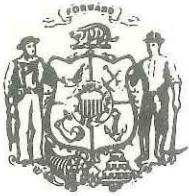
Group 5 (RCRA/CERCLA SITES)

No action on RCRA permit issuance, until national guidance is available.

We plan on sending the attached letter and certification statement to all subject facilities by February 15, 1985. (Even though Minnesota is authorized, the letter does not need to be modified.) Please let me know if you have any questions.

Attachments

cc: David Stringham
Mary Gade, ORC
Bill Miner, HWB
Rich Bartelt, ERB
Vicki Thomas
SWB Supervisors
TPS Staff



State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny
Secretary

BOX 7921
MADISON, WISCONSIN 53707

November 18, 1985

IN REPLY REFER TO: 4430

RECEIVED

DEC - 2 1985

SOLID WASTE BRANCH
U.S. EPA, REGION V

Mr. Charles Slaustas
U.S. EPA - Region V, 5HS/12
230 South Dearborn Street
Chicago, IL 60604

RE: Hazardous Waste Facility Part B Application
Facility EPA ID No.: WID-000808444
Facility Name: Kimberly-Clark Development Facility North
Facility Address: 1111 South Henry Street, Neenah, WI 54956

Dear Mr. Slaustas:

The revised hazardous waste Part B application and correspondence for the above referenced facility received on October 30, 1985 has been reviewed for completeness by the Bureau of Solid Waste Management. Based on this review, the Department has determined that the Part B Application does contain the minimum information required by RCRA. Additional information may be required if the Department's detailed review indicates that a determination cannot be made without submitting additional information.

Should you have any questions regarding this determination, feel free to call Rick Krueger at (608) 266-5425 or Jim Reyburn at (414) 497-4397.

Sincerely,
Bureau of Solid Waste Management

Richard E. O'Hara

Richard E. O'Hara, Chief
Hazardous Waste Management Section

REO:RK:jk
6581T

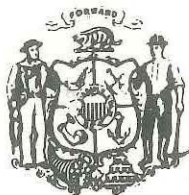
cc: Systems Management Section
Rick Krueger - SW/3
Jim Reyburn - Lake Michigan District
Wisconsin State Specialist - U.S. EPA - Region V, 5HS/12
Tony Holaska - U.S. EPA - Region V, 5HS/12
Ed Lynch - SW/3

RECEIVED

NOV 22 1985

SOLID WASTE BRANCH
U.S. EPA, REGION V

COPY 2



State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny
Secretary

BOX 7921
MADISON, WISCONSIN 53707

August 19, 1985

IN REPLY REFER TO: 4430

Mr. Charles Slaustas
Technical, Permits & Compliance Section
USEPA 5HW-13
230 South Dearborn Street
Chicago, IL 60604

RE: Hazardous Waste Facility Part B Application
Facility EPA ID No.: WID000808444
Facility Name: Kimberly Clark Development Facility-North
Facility Address: 1111 South Henry Street
Neenah, Wisconsin 54956

Dear Mr. Slaustas:

The hazardous waste Part B Application and correspondence for the above referenced facility received on July 10, 1985 has been reviewed for completeness by the Bureau of Solid Waste Management. Based on this review, the Department has determined that the Part B Application does not contain the information required by RCRA and is therefore incomplete. In order to complete the processing of the Part B application the information specified in the enclosure must be submitted.

This letter does not recommend denial of the Part B Application but merely indicates the additional information needed to complete the review. Submittal of this information does not insure approval nor does it preclude the Department from recommending requirement of additional information if the need is demonstrated through a more detailed review.

By copy of this letter Kimberly Clark is being notified of deficiencies found in their RCRA Part B Permit Application. The facilities copy, therefore, serves to notify Kimberly Clark of these concerns and also informs the facility that it has 30 days to respond to these deficiencies.

If you have any questions regarding the completeness review, please contact Eric Syftestad at (608) 266-2699 or Jim Reyburn at (414) 497-4397.

Sincerely,
Bureau of Solid Waste Management

Richard E. O'Hara
Richard E. O'Hara, Chief
Hazardous Waste Management Section

REO:ES:sa/3953P
Attachment

cc: Systems Management Section
Eric Syftestad - SW/3
Jim Reyburn - LMD District
Wisconsin State Specialist - U.S. EPA - Region V
Edward Masak, Jr. - Mill Manager/Kimberly Clark

ATTACHMENT

Notice of Deficiency

Kimberly Clark Facility Development-North
WID000808444

All comments must be responded to in letter form explaining each of the responses, and by modifying appropriate pages of the permit application where changes are made. Five copies of the response are necessary. Two of these copies must be submitted to the US EPA-Region V in Chicago. Three copies must be submitted to the Wisconsin DNR.

The following information must be submitted:

FACILITY DESCRIPTION:

	<u>Title 40</u> <u>Code of Federal Regs.</u>	<u>Part B Submittal</u> <u>Section</u>	<u>Page</u>
1. Submit a topographic map which shows the facility and the distance of the 1,000 feet around it at a scale of 1" equal to not more than 200 feet. The map must include: contours sufficient to show surface water flow around the facility unit operations, surrounding land uses, and fire control facilities.	270.19(b)(19)	Part A Figure 2 Figure 4B	1G, 1H B.2
2. Describe the traffic pattern on-site including estimated volume, access road surfacing, and load bearing capacity.			
Is hazardous waste hauled throughout the day or night? If so, what precautions are taken in crossing railroad tracks at night? What is the frequency of rail traffic?	270.14(b)(10)		

WASTE CHARACTERISTICS

3. List the sampling methods used to obtain a representative sample from the spent ink solvent drum.	264.13(b)(4)	C	7
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	<u>Title 40</u> <u>Code of Federal Regs.</u>	<u>Part B Submittal</u> <u>Section</u>	<u>Page</u>
4. Describe the methods used to meet additional waste analysis requirements necessary for storing ignitable waste.	264.13(b)(6), 264.17	C	7
5. Do non-facility people perform the sampling procedures? Document or certify representative sampling procedures for non-facility people.	264.13(b)(6), 264.17	C	7

PROCESS INFORMATION

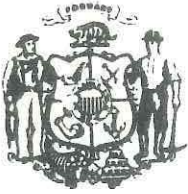
6. Describe the specific process information for the storage of hazardous waste as follows: a) Container condition (new, reused, reconditioned). b) Markings and labels (labels, placards, tags, stencils). c) Discuss procedures for transporting containers across the existing and proposed facility and discuss aisle space maintained between rows of containers.	264.171-2, 264.173	D	10
7. Demonstrate the capability of the base to contain liquids, specifically: a) that the base is free of cracks or gaps. b) base design and materials of construction.	264.175(b)(1)	D	11
Provide design and profile drawings of the existing storage areas showing the secondary containment system. Indicate on the drawings the aisle space configuration.	270.15(a)(1), 264.175(a)	D	11

	<u>Title 40</u> <u>Code of Federal Regs.</u>	<u>Part B Submittal</u> <u>Section</u>	<u>Page</u>
Are the containers stored on pallets or otherwise protected from contact with accumulated liquids?	270.15(a)(2), 264.175(b)(2)	D	11
8. Describe how liquids are removed from the containment system. Describe the procedures and equipment used during this process.	270.15(a)(5) 264.175(b)(5)	D	11
<u>PROCEDURES TO PREVENT HAZARDS</u>			
9. Demonstrate that the facility maintains sufficient aisle space to allow the unobstructed movement of personnel, fire protection equipment, or spill control equipment to any area of the facility operation in an emergency	264.35	F	-
<u>CONTINGENCY PLAN</u>			
10. Describe procedures for insuring that all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.	264.56(h)(1)	G	19C
<u>PERSONNEL TRAINING</u>			
11. It is suggested that the annual review address incidences that have occurred in the past year that warranted use of the contingency plan and/or emergency action. This review should focus on the cause of the incident and identification of steps to be taken to prevent or insure better handling of such events in the future.	264.16(a)(1)	H	30

	<u>Title 40</u> <u>Code of Federal Regs.</u>	<u>Part B Submittal</u> <u>Section</u>	<u>Page</u>
<u>CLOSURE REQUIREMENTS</u>			
12. Describe the maximum inventory of wastes in storage and in treatment at any time during the life of the facility.	264.112(a)(2)	I	32
<u>PART B CERTIFICATION</u>			
13. The permit application certification must be signed by a responsible corporate officer.	270.11	-	40

3953P

cc: Ed Lynch - SW/3



State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny
Secretary

BOX 7921
MADISON, WISCONSIN 53707

July 11, 1985

IN REPLY REFER TO: 4430

RECEIVED

JUL 18 1985

SOLID WASTE BRANCH
U.S. EPA, REGION V

Mr. Charles Slaustis, Chief
Technical, Permits and Compliance Section
230 South Dearborn Street
Chicago, IL 60604

RE: Hazardous Waste Part B Application for Kimberly Clark Developments
Facility North,
EPA ID No.: WID 000808444

Dear Mr. Slaustis:

This is to acknowledge receipt of the Part B application for the above referenced facility located at 1111 South Henry Street Neenah Wisconsin by the Bureau of Solid Waste Management on July 1, 1985.

The assigned technical review staff for this facility is Eric Syftestad (608) 266-2699 and the district hazardous waste staff is Jim Reyburn (414) 497-4397.

Should you have any questions regarding the review and status of the application, contact the above mentioned staff or myself at 608/266-0833.

Sincerely,
Bureau of Solid Waste Management

Richard E. O'Hara

Richard E. O'Hara, Chief
Hazardous Waste Management Section

REO:ES:ms/5130V

cc: Systems Management Section
Eric Syftestad - HWS
Jim Reyburn - Lake Michigan District
Wisconsin State Specialist - U.S. EPA - Region V



KIMBERLY-CLARK CORPORATION

Ms. Lisa Binder
RCRA Activities
U.S. EPA Region 5
P.O. Box 83587
Chicago, Il. 60690

April 2, 1982

Per a request from Bernadette Stepnowski of A.T. Kearney, find enclosed a copy of the communications to Mr. George Kraft regarding Wisconsin DNR RCRA permit applications.

VCL:tlh

/enclosure

Victor C. Lang
Mill Process Engineer
Development Facility
1111 S. Henry St.
Neenah, Wi. 54956





June 28, 1985

RCRA Activities
Part B Permit Application
U.S. E.P.A. Region V
P. O. Box A3587
Chicago, IL. 60690-3587

RECEIVED
JUL 1 - 1985

WMD-RAIU
EPA, REGION V

Enclosed are two (2) copies of the Development Facility
North hazardous waste storage facility Part B Permit
Application as requested.

Yours truly,

Edward Masak, Jr.
Mill Manager
Development Facility North

EM:cw

RE: EPA I.D. No. #WID000808444

Copies (2) to: Ed Lynch WI DNR

Bureau of Solid Waste Management
101 S. Webster St. 63F11 Box 7921
Madison, Wi. 53707

Copy to:

Jim Reyburn
Department of Natural Resources
1125 N. Military Ave.
Green Bay, Wi. 54303

COPY 2



NALCO CHEMICAL COMPANY

2901 BUTTERFIELD ROAD • OAK BROOK, ILLINOIS 60521 • AREA 312-887-7500

May 3, 1982

Administrator for RCRA Activities
U. S. Environmental Protection Agency
Region V
Post Office Box 7861
Chicago, Illinois 60680

Re: Interim Status, Facilities:

ILD005092572 *g, TSD, PA*

ILD042075044 *g, TSD, PA*

ILD000682120 *g, TSD, PA*

Gentlemen:

We submitted RCRA permit applications Form 1 and Form 3 for each of the subject facilities in November, 1980 in order to qualify for Interim Status. The applications were sent by Certified Mail and we have a receipt indicating that they were delivered to your office. However, we have never received an acknowledgment from you of these applications.

Until now, we have presumed that you have been too busy to acknowledge such applications. However, we recently were asked why we hadn't applied for a permit for another of our facilities even though we did apply in November, 1980. Therefore, to put our records on a better basis, we request an acknowledgment of our applications for Interim Status for the subject facilities.

Sincerely,

L. J. Domzalski

L. J. Domzalski
Technical Manager

LJD:bg

CC: Karsten Odland

RECEIVED

MAY 10 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

RECEIVED
5/10/82



State of Wisconsin / DEPARTMENT OF NATURAL RESOURCES

Lake Michigan District Headquarters
1125 North Military Avenue
P.O. Box 10448
Green Bay, WI 54307-0448

Carroll D. Besadny
Secretary

April 23, 1985

File Ref: 4430

Mr. John Eckert
Kimberly Clarke Corp.
1111 S. Henry Street
Neenah, WI 54956

JUN 24 1985

Dear Mr. Eckert:

Re: Kimberly Clarke Development Facility North
(WID000808444) 1111 S. Henry Street
Notice of Noncompliance

This office has reviewed the revised contingency plan, training plan and inspection schedule submitted under a March 25, 1985, cover letter in response to the Department's February 12, 1985, Notice of Noncompliance. Based upon my review, I have found that the facility is now in compliance with all Wisconsin Administrative Code, Chapter NR 181 Hazardous Waste Regulations.

As we discussed, representatives from the Department's Bureau office in Madison and perhaps EPA Region V would like to meet with you on Tuesday, April 30, 1985, at 10:00 a.m. to review your future part B permit submittal. At that time we can discuss the installation of an alarm in storage area number 4. In addition, please notify me when storage area number 3 has been closed.

Thank you for your cooperation in this matter. If you have any questions, please contact me at 414-497-4397.

Sincerely,

A handwritten signature in cursive script, appearing to read "James Reyburn".

James Reyburn
Hazardous Waste Specialist

JR:1vp

cc: Bureau of Solid Waste, Hazardous Waste Section

CORRESPONDENCE/MEMORANDUM

FMS file
STATE OF WISCONSIN

Date: May 28, 1985

File Ref: 4430

File: Kimberly Clarke, Dev. Facility North
WID000808444

From: Mike Tierney - SW/3

MFT

Subject: Part B Permit Writing Assistance Visit at Kimberly Clarke Corp.
Dev. Facility North, 1111 S. Henry Street, Neenah, WI.

On Tuesday, April 30, 1985 a RCRA Part B site visit was conducted at this generator storage facility. The purpose was to provide assistance to the company during preparation of their RCRA, Part B permit application.

The Part B permit application was called in on December 28, 1984 and is due on July 1, 1985. A follow-up of a 1/29/85 compliance monitoring inspection was conducted by Jim Reyburn, the LMD Hazardous Waste Specialist observing this facility. A Class I violation (a missing alarm in storage area) was corrected and verified.

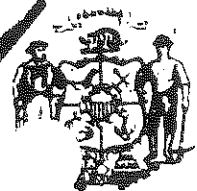
Mr. Victor Lang, the facility's environmental manager, met with Jim Reyburn, Al Debus, EPA Region V permit writer, and myself. We discussed the advantages of submitting a Part B application using the suggested format. I gave Mr. Lang a RCRA subject index to accompany the permit checklist he had received from EPA. I also gave him an EPA document regarding storage tank construction and inspection standards and EPA guidelines for preparing a waste analysis plan.

We toured the facility, noting that one of the four storage areas was not in use, and were told another area would soon be withdrawn as a storage area.

I emphasized the importance of Kimberly Clarke contacting me during the writing of the permit application if questions arose.

MT:amp

cc: Barb Zellmer - SW/3
Jim Reyburn - LMD



State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES

Lake Michigan District Headquarters
1125 North Military Avenue
P.O. Box 10448
Green Bay, WI 54307-0448

Carroll D. Besadny
Secretary

February 12, 1985

File Ref: 4430

Mr. John Eckert
Kimberly Clark Corp. - Development Facility North
1111 S. Henry Street
Neenah, WI 54956

Dear Mr. Eckert:

Re: Kimberly Clark Development Facility North
(WID000808444) Hazardous Waste Storage
Site Inspection at 1111 S. Henry Street
Neenah, Wisconsin

Thank you for meeting with me on January 29, 1985 to conduct an inspection at the above referenced facility. Based on information obtained at the time of the inspection the following items were found to be in noncompliance with Wisconsin Administrative Code Chapter NR 181.

- A. Add all safety and emergency equipment, security devices, and structural equipment to the inspection schedule/log per NR 181.42(7).
- B. NR 181.42(4)(b)3 states that no employee shall be allowed to work in a storage area alone without a readily accessible alarm. Storage area #4 (flammable shed south of the main building) should be equipped with an alarm or some type of external communication device. You indicated that two personnel would be used for safety purposes when managing hazardous waste in area #4. These actions and emergency procedures should be identified in the contingency plan and training plan/record.

Please submit to this office within 90 days a revised contingency plan and training plan. If you have any questions call me at 414-497-4397.

Sincerely,

James Reyburn
Hazardous Waste Specialist

JR:cks

cc: Bureau of Solid Waste - Hazardous Waste Section

FMP file
Wagner

Lake Michigan District Headquarters
1125 N. Military Avenue
Box 3600
Green Bay, WI 54303-1208

October 7, 1982

4430

Mr. Victor Lang
Kimberly Clark Corporation
Development Facility North
1111 S. Henry Street
Neenah, WI 54956

Dear Mr. Lang:

Re: Hazardous Waste Storage Facility
(WID 000808444) Inspection Results

It has been brought to my attention that the inspection forms completed by Mr. Thomas Blake on May 27, 1982 were never provided to you. Enclosed are copies of the inspection forms, please accept my apology for the delay.

Based upon my review of the completed forms it was found that this facility was in compliance with the general facility standards of Chapter NR 181. An interim license will be issued to you in the near future.

→ DATED 10/25/82

I am looking forward to meeting with you at 2:00 P.M. October 18, 1982 to observe the storage areas and waste management practices. If you have any questions call me at 414-497-4397.

Sincerely,

JR
James Reyburn
Hazardous Waste Specialist

JR:cs

Enc.

→ cc: Bureau of Solid Waste - SW/3

STATEMENT OF BASIS

KIMBERLY CLARK — DEVELOPMENT FACILITY NORTH
NEENAH, WISCONSIN

WID 000808444

This is a statement of the basis for the Draft Hazardous Waste Permit for the subject facility. It briefly describes the derivation of the conditions of the draft permit and the reasons for them. Under 40 CFR 124.7 (Title 40 of the Code of Federal Regulations, Section 124.7), the Statement of Basis is sent to the applicant and to any other person who requests it.

A. FACILITY DESCRIPTION

THE KIMBERLY CLARK-DFN FACILITY IS LOCATED AT 1111 SOUTH HENRY STREET, NEENAH, WI. THE FACILITY IS A DEVELOPMENT AREA USED TO DEMONSTRATE THE FEASIBILITY OF PROTOTYPE EQUIPMENT, AND TO MANUFACTURE POLYPROPYLENE AND PULP-BASED PRODUCTS. HAZARDOUS WASTES ARE GENERATED AS A RESULT OF MAINTENANCE, EQUIPMENT CLEANING, LABORATORY, AND PROCESS OPERATIONS. ALL WASTES ARE TRANSPORTED OFF-SITE FOR DISPOSAL OR RECYCLING.

TWO STORAGE AREAS EXIST AT THE FACILITY. A 300 SQUARE FOOT METAL STORAGE BUILDING WITH EXPLOSION-PROOF LIGHTING, FIRE ALARM, AND FIRE EXTINGUISHER IS USED TO STORE FLAMMABLE SOLVENTS. CHLORINATED SOLVENTS ARE STORED IN A 108 SQUARE FOOT STORAGE AREA WITH CO₂ FIRE EXTINGUISHER AND AUTOMATIC SPRINKLERS. THE FACILITY'S PART B PERMIT APPLICATION ALLOWS THE STORAGE OF A MAXIMUM OF 40 DRUMS OF HAZARDOUS WASTE. KIMBERLY CLARK-NDF GENERATES APPROXIMATELY ONE TO TWO DRUMS (55 GALLON SIZE) OF HAZARDOUS WASTE PER MONTH. THE FACILITY HAS COMPLETED THE HSWA "CERTIFICATION REGARDING POTENTIAL RELEASES" FORM AND INDICATED THAT THERE ARE NO KNOWN PAST RELEASES FROM ANY SOLID WASTE MANAGEMENT UNITS.

B. PERMIT APPLICATION

The permit application cited herein is the JUNE 28, 1985 Part B application as amended on

JANUARY 2, 1986.

C. PURPOSE OF THE PERMITTING PROCESS

The purpose of the permitting process is to afford the United States Environmental Protection Agency (U.S. EPA), interested citizens, and other governmental agencies the opportunity to evaluate the ability of the applicant to comply with the applicable Hazardous Waste Management requirements under the Resource Conservation and Recovery Act (RCRA). The U.S. EPA is required to prepare a draft permit which sets forth in one concise document all the applicable requirements with which the Agency intends to require the Permittee to comply during the ten year duration of the permit.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984, were enacted to modify the Resource Conservation and Recovery Act (RCRA). Under Section 206 of the Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. The State of Wisconsin has notified the U.S. EPA of their finding that *KIMBERLY CLARK - DEV. FAC. NORTH* is not an environmentally significant facility, and that no spills or releases of hazardous wastes or constituents from any solid waste management unit have been released to the environment. Comments are hereby solicited from the public as to whether any ever occurred at this site.

D. PROCEDURES FOR REACHING A FINAL DECISION

Under Section 7004(b) of RCRA and 40 CFR 124.10, the public is given forty-five days to review the application and comment on the draft permit conditions and the facility's corrective action statement prior to U.S. EPA taking any final permitting action on the application for a Hazardous Waste Management permit. The comment period will begin on the date of publication of the public notice in a major local newspaper of general circulation. When the Regional Administrator of the U.S. EPA makes his final permit decision, notice will be given to the applicant and each person who has submitted written comments or requested a change in the draft permit conditions or commented on the corrective action statement. If none of the comments received requested a change in either the draft permit conditions or challenged the corrective action statement, the permit will become effective immediately upon issuance of the permit. If comments received during the comment period requested changes in the draft permit conditions or effected the status under corrective action, then the final permit will become effective thirty (30) days after service of notice of the decision or at a later date if review is requested under 40 CFR 124.19.

The issuance of a Hazardous Waste Management Permit will be coordinated by both U.S. EPA and the Wisconsin Department of Natural Resources. At this time each Agency has regulations which require a permit to be issued for all facilities which treat, store, or dispose of hazardous waste. If the State receives Phase II interim authorization for the hazardous waste program, the State will assume the administration of the Federal hazardous waste permitting program and this permit.

E. BRIEF SUMMARY OF THE PERMIT CONDITIONS

This section provides a brief summary of the permit conditions in the draft permit. The column titled "Regulation" provides the regulatory authority for the permit condition specified in the column titled "Permit Condition."

B.1.2

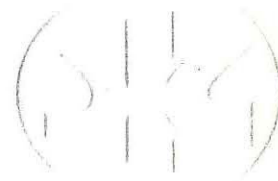


January 2, 1986

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JAN 13 1986

SOLID WASTE BRANCH
U.S. EPA, REGION V



Mr. Richard E. O'Hara, Chief
Hazardous Waste Management Section
Department of Natural Resources
Box 7921
Madison, Wi. 53707

Refer to: 4430

Dear Mr. O'Hara,

Enclosed please find the revised Part B Application for Kimberly-Clark Development Facility North, 1111 S. Henry St., Neenah, Wisconsin, 54956; Facility EPA ID# WID000808444. The following information has been submitted. Also included is the Certification regarding potential releases from solid waste management units.

Item 1. Closure of storage Area 2 and storage Area 3.
Storage Area 2 was never used for storage of Hazardous Waste. It was included in the original Permit Application as a potential storage site which later was deemed unnecessary.

Storage Area 3 was used for storage of waste Dowtherm J (flammable hazardous waste). At time of closure, no releases of waste had occurred. The site was visually inspected and certified free of contaminants and spills. One partially filled drum in storage at time of closure was moved to storage Area 4 which will now be used for waste Dowtherm J storage and Flammable Liquid NOS waste.

Item 2. See pages 6, 10, 10A and 10A1. Traffic patterns are defined in more detail and shown on map on page 10A1.

Item 3. See page 7j for further explanation of sampling equipment and technique.

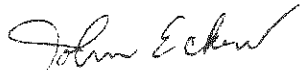
Item 4. Container management practices in process area is further described on page 10.

Item 5. A statement has been added to pages 10 and 11 stating the physical condition of the secondary containment system and its integrity.

Item 6. Rainwater run-off and removal from catch tanks is addressed on page 19d.

COPY /

- Item 7. The imminent or actual emergency situation requiring implementation of the contingency plan is defined on page 19g.
- Item 8. Procedures for ensuring that all equipment used in implementation of the contingency plan is discussed on page 19i.
- Item 9. Storage and catch basin decontamination is described on page 32.
- Item 10. The financial assurance mechanism has been changed to reflect a capacity of 40 drums. The bond covers closure and liability for at least 40 drums.



John C. Eckert
Process Engineer
Development Facility North

JCE:cw

RECEIVED

JAN 13 1986

SOLID WASTE BRANCH
U.S. EPA, REGION V

© 71

A.1. Part A - ORIGINAL PERMIT APPLICATION

I. EPA ID. NUMBER
II. FACILITY NAME
III. FACILITY MAILING ADDRESS
VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP DEVELOPMENT FACILITY NORTH

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)

B. PHONE (area code & no.)

2 LANG VICTOR MILL PROCESS ENG 414 721 2959

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 1111 SOUTH HENRY STREET

B. CITY OR TOWN

C. STATE

D. ZIP CODE

4 NEENAH WI 54956

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 1111 SOUTH HENRY STREET

B. COUNTY NAME

NEENAH WISCONSIN

C. CITY OR TOWN

D. STATE

E. ZIP CODE

F. COUNTY CODE (if known)

6 NEENAH WI 54956

A. FIRST (specify) 7	B. SECOND (specify) 7
C. THIRD (specify) 7	D. FOURTH (specify) 7

II. INFORMATION

A. NAME KIMBERLY CLARK CORPORATION	B. Is the name listed in Item VIII-A also the owner? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
--	--

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box. If "Other", specify.) F - FEDERAL M - PUBLIC (other than federal or state) S - STATE O - OTHER (specify) P - PRIVATE P (specify)	D. PHONE (area code & no.) 414 721 2000
--	---

E. STREET OR P.O. BOX NORTH LAKE STREET	
---	--

F. CITY OR TOWN N.E.E.N.A.H.	G. STATE W.I.	H. ZIP CODE 54956	IX. INDIAN LAND Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
--	-------------------------	-----------------------------	---

EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water) N W I 0.026140-2	D. PSD (Air Emissions from Proposed Sources) 9 P	
B. UIC (Underground Injection of Fluids) U	E. OTHER (specify) (specify)	
C. RCRA (Hazardous Wastes) 9	E. OTHER (specify) (specify)	

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

This is a development facility to demonstrate feasibility of prototype equipment and to manufacture polypropylene and pulp based products.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print) L. Smith Vice President of Operations	B. SIGNATURE 	C. DATE SIGNED 10/26/81
--	-------------------------	-----------------------------------

COMMENTS FOR OFFICIAL USE ONLY	
---------------------------------------	--

FOR OFFICIAL USE ONLY
APPLICATION APPROVED
DATE RECEIVED
(yr. mo. & day)

COMMENTS

OR REVISED APPLICATION

Enter an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)
☐ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)
☐ 2. NEW FACILITY (Complete item below.)
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)
FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN
B. REVISED APPLICATION (place an "X" below and complete item I above)
☒ 1. FACILITY HAS INTERIM STATUS
☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. (If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).)

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS			
EXTRACTION WELL	D79	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
DEWATERING	D80	ACRE-Feet (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-Feet	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	G
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP

LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEAS- URE (enter code)				1. AMOUNT	2. UNIT OF MEAS- URE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	1375	G		7				
	0 1	1375	G		8				
	S 0 1	1375	G		9				
4	S 0 1	1375	G		10				

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

- 1. PROCESS CODES:
For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

- 2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES			
				1. PROCESS CODES (enter)			2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K054	900	P	T	0	3	D80
X-2	D002	400	P	T	0	3	D80
X-3	D001	100	P	T	0	3	D80
X-4	D002						Included with above

W100008084441

W

DUP

2

DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

1	A. EPA HAZARD. WASTE NO. (enter code)			B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES								
	27	28	29			1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (If a code is not entered in D(1))				
	30	31	32	33	34	35	36	37	38	39	40	41	42	43
1	F	0	0	1	10,000	P	S	0	1					
2	D	0	0	1	5,000	P	S	0	1					
3														
4														
5														
6														
7														
8														
9														
10														
11														
12														
13														
14														
15														
16														
17														
18														
19														
20														
21														
22														
23														
24														
25														
26														

EPA I.D. NO. (enter from page 1)													
9	8	7	6	5	4	3	2	1	0	9	8	T/A	C
F	W	I	D	0	0	0	8	0	8	4	4		6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

44 10 35

88 28 10

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

1. NAME OF FACILITY'S LEGAL OWNER												2. PHONE NO. (area code & no.)											

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

3. STREET OR P.O. BOX												4. CITY OR TOWN												5. ST.												6. ZIP CODE											

IX. OWNER CERTIFICATION

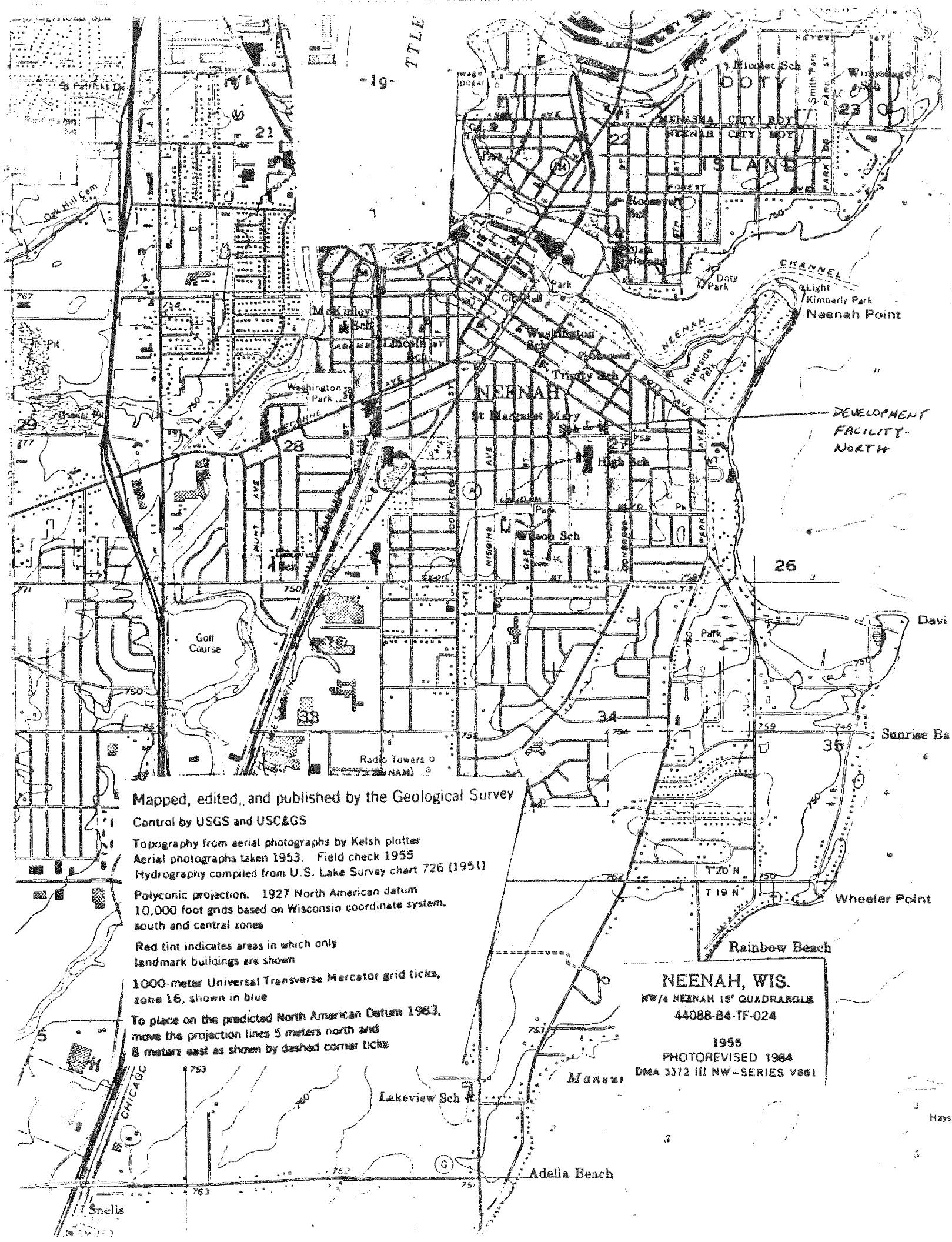
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)		B. SIGNATURE		C. DATE SIGNED	
M. L. Smith, Vice President of Operations				10/26/89	

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)		B. SIGNATURE		C. DATE SIGNED	



Mapped, edited, and published by the Geological Survey
 Control by USGS and USC&GS

Topography from aerial photographs by Kelsh plotter
 Aerial photographs taken 1953. Field check 1955
 Hydrography compiled from U.S. Lake Survey chart 726 (1951)

Polyconic projection. 1927 North American datum
 10,000 foot grids based on Wisconsin coordinate system,
 south and central zones

Red tint indicates areas in which only
 landmark buildings are shown

1000-meter Universal Transverse Mercator grid ticks,
 zone 16, shown in blue

To place on the predicted North American Datum 1983,
 move the projection lines 5 meters north and
 8 meters east as shown by dashed corner ticks

-19-

TITLE

DEVELOPMENT
 FACILITY-
 NORTH

Sanrise Ba

Wheeler Point

Rainbow Beach

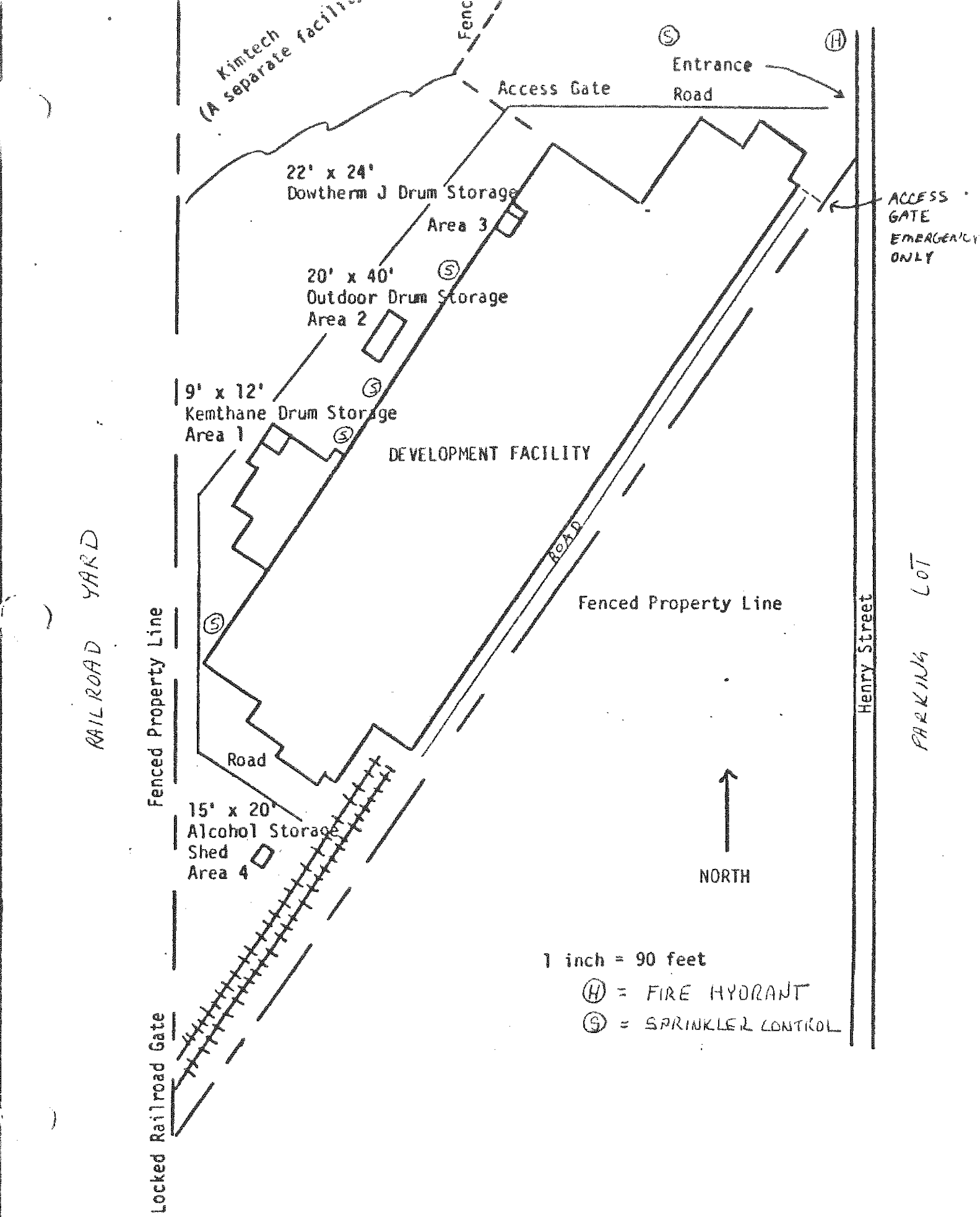
Mansu

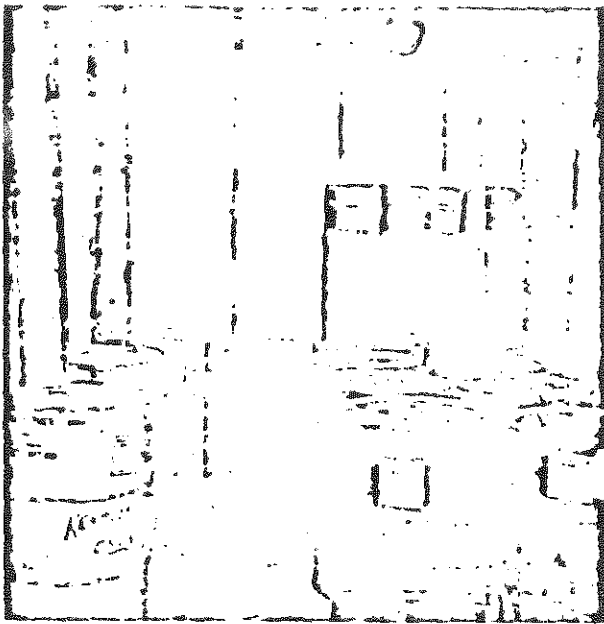
Adella Beach

Lakeview Sch

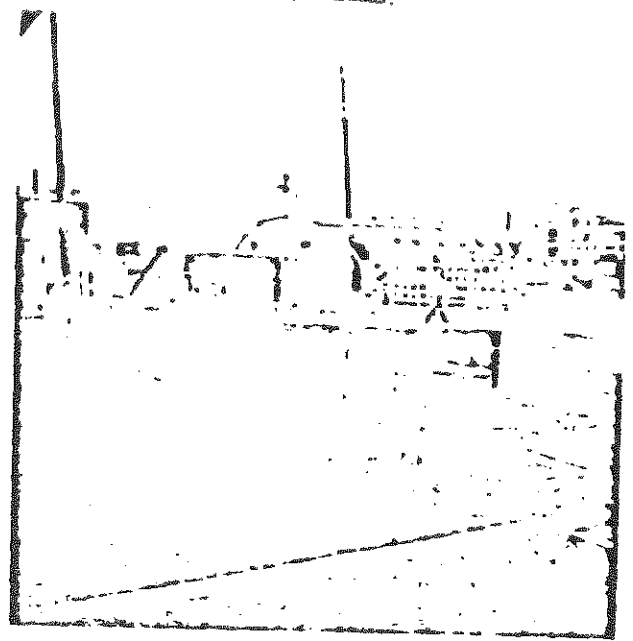
CHICAGO

Hays

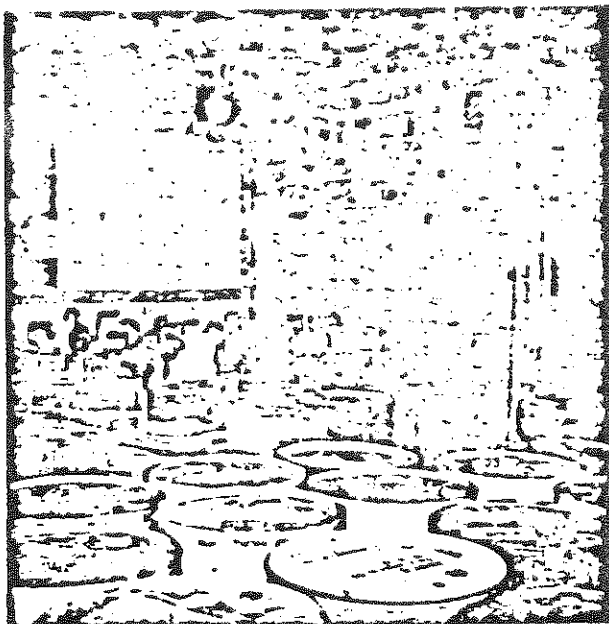




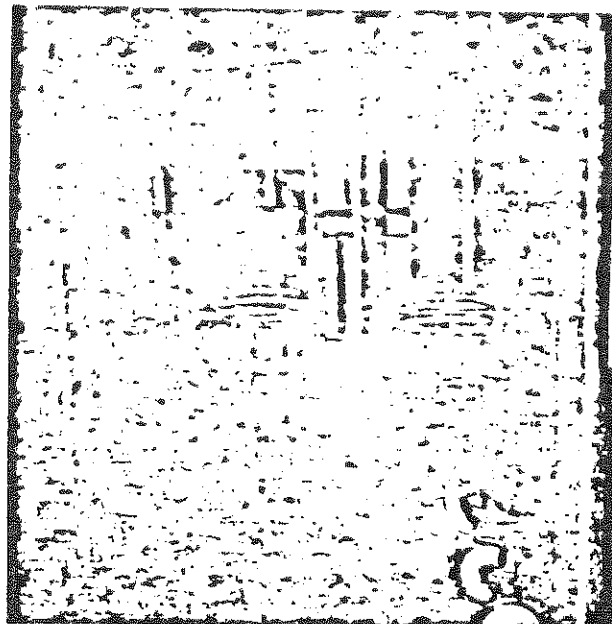
AREA 1



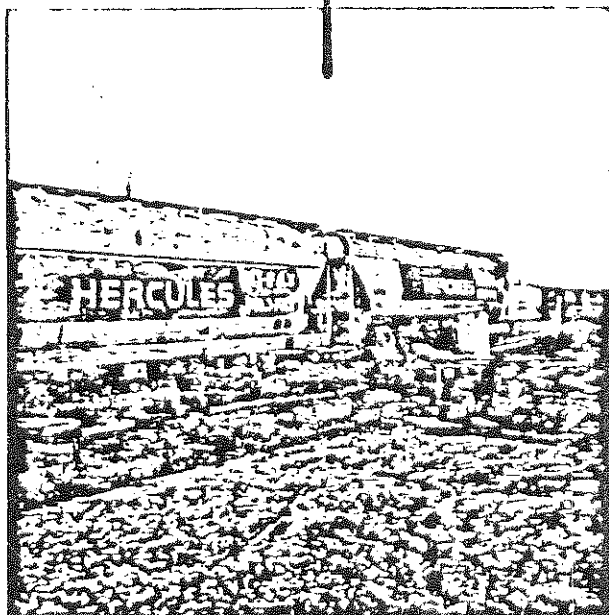
AREA 2



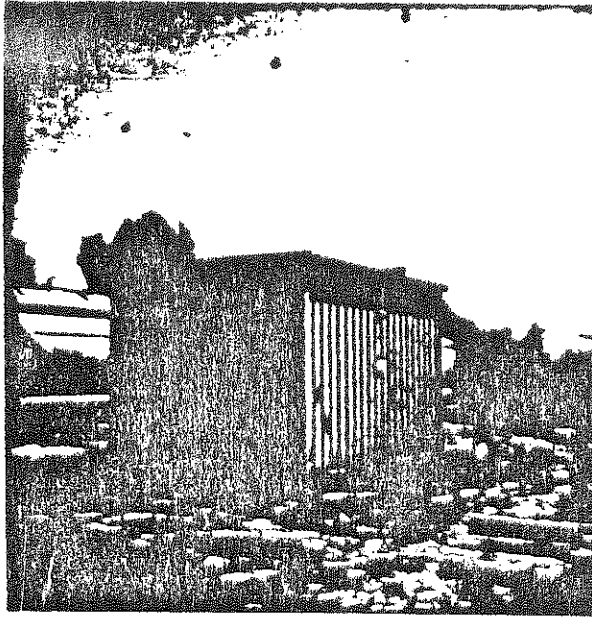
AREA 3



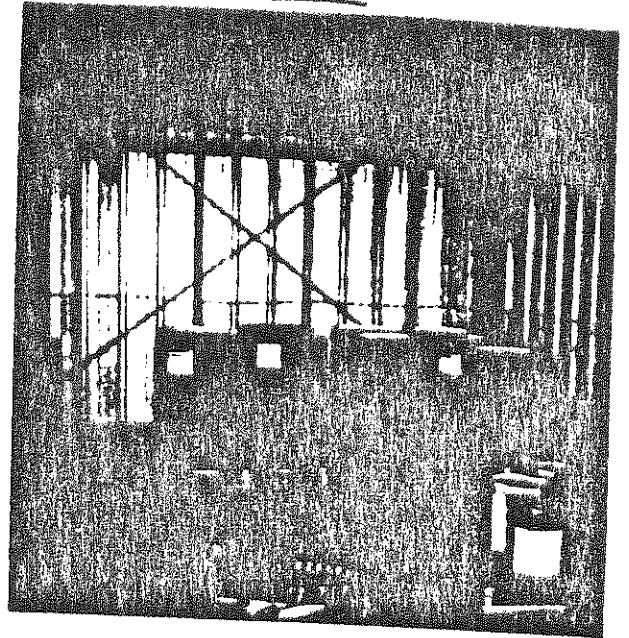
AREA 3



AREA 4



AREA | 4



AREA | 4



KIMBERLY-CLARK CORPORATION

Kimberly-Clark Corporation
Development Facility
1111 S. Henry St.
Neenah, Wi. 54956

Department of Natural Resources
Tom Blake
1125 N. Military Ave.
Box 3600
Green Bay, Wisconsin 54303

June 1, 1982

RE: RCRA INSPECTION AT KIMBERLY-CLARK CORP./
DEVELOPMENT FACILITY NORTH

Dear Mr. Blake:

Per your request during the inspection conducted by you on 05/27/82, find enclosed two photographs of our waste alcohol storage area. These replace the one sent in with our Part A Permit Application labeled AREA 4.

If you have any questions, please call me at 414-721-2959.

Very Truly Yours,

Victor C. Lang
Mill Process Engineer
Development Facility

VCL:tlm

/enclosures

bcc: ~~H. A. Lindeke~~/Environmental; *File*
Hazardous Chemicals-RCRA

bcc: K. Chopp-KCN

- A. 2. PART A - REVISED PERMIT APPLICATION - only
the revised pages are included.



U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

1. EPA I.D. NUMBER

1	W	I	D	0	0	0	8	0	8	4	4	4
---	---	---	---	---	---	---	---	---	---	---	---	---

FOR OFFICIAL USE ONLY

PUBLICATION PROVED	DATE RECEIVED (yr., mo., & day)					

COMMENTS

INITIAL OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item 1 above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☐ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

71	FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)											
yr.	72		mo.		day							
73	74	75	76	77	78	79	80	81	82	83	84	85

☐ 2. NEW FACILITY (Complete item below.)

YR.		MO.		DAY	
73	74	75	76	77	78

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete item 1 above)

☐ 1. FACILITY HAS INTERIM STATUS ☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. **PROCESS CODE** — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY -- For each code entered in column A enter the capacity of the process.

1. **AMOUNT** – Enter the amount.

2. **UNIT OF MEASURE** – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (barrel, drum, etc.)	501	GALLONS OR LITERS
TANK	502	GALLONS OR LITERS
WASTE PILE	503	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	504	GALLONS OR LITERS

WELL	D79	GALLONS OR LITERS
WELL	D80	ACRE-FeET (the volume that
		would cover one acre to a
		depth of one foot) OR
		HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR
		LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

<u>Treatment:</u>	
TANK	T01 GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02 GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03 TONS PER HOUR OR

OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U

UNIT OF MEASURE	UNIT OF MEASURE CODE
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H

UNIT OF MEASURE	UNIT OF MEASURE CODE
ACRE-FEET.	A
HECTARE-METER.	F
ACRES.	B
HECTARES.	C

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C						T/A C						I																												
DUP																																								
LINE NUMBER		A. PROCESS CODE (from list above)		B. PROCESS DESIGN CAPACITY						FOR OFFICIAL USE ONLY		LINE NUMBER		A. PROCESS CODE (from list above)		B. PROCESS DESIGN CAPACITY						FOR OFFICIAL USE ONLY																		
				1. AMOUNT (specify)						2. UNIT OF MEASURE (enter code)						1. AMOUNT						2. UNIT OF MEASURE (enter code)																		
X-1	S	0	2								600	G																												
X-2	T	0	3								20	E																												
1	5	0	1								2200	G																												
4																																								

III. PROCESSES (continued)

SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY

V. DESCRIPTION OF HAZARDOUS WASTES

EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

PROCESSES

- 1. PROCESS CODES:
For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).
- 2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by one then one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 10 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE		C. UNIT OF MEASURE (enter code)		D. PROCESSES					
									1. PROCESS CODES (enter)			2. PROCESS DESCRIPTION (if a code is not entered in D(1))		
X-1	K	0	5	4	900		P		T	0	3	D	8	0
X-2		0	0	2	400		P		T	0	3	D	8	0
X-3	D	0	0	1	100		P		T	0	3	D	8	0
X-4	D	0	0	2									included with above	

IV. DESCRIPTION OF HAZARDOUS WASTE(S)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3

EPA ID NO (enter from page 1)												
F	W	I	D	0	0	0	8	0	8	4	4	6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures, existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)										LONGITUDE (degrees, minutes, & seconds)									
4	4	1	0	3	5	8	8	2	8	1	0								

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER										2. PHONE NO (area code & no.)									
3. STREET OR P.O. BOX										4. CITY OR TOWN									
5. ST.										6. ZIP CODE									

IX. OWNER CERTIFICATION

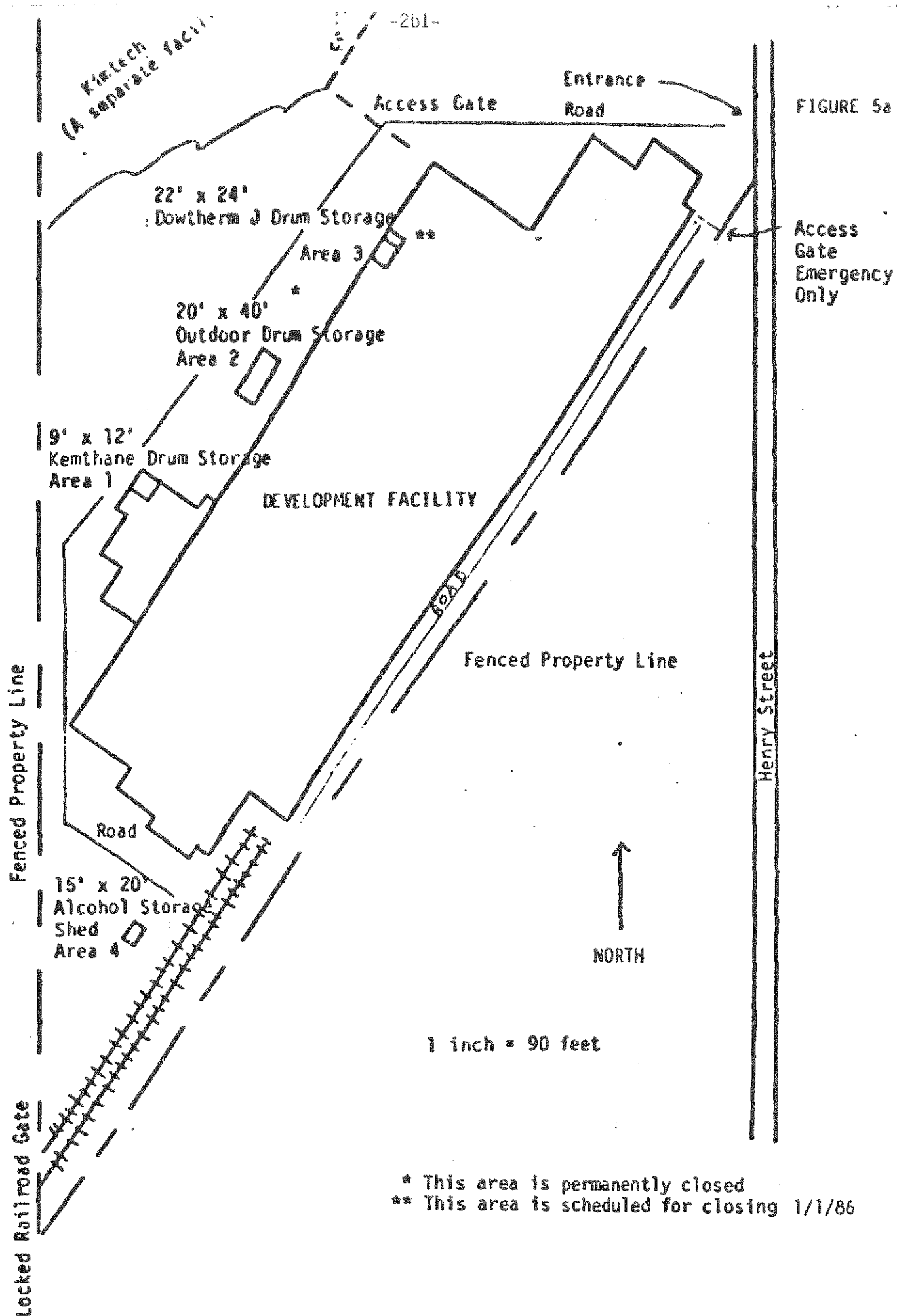
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

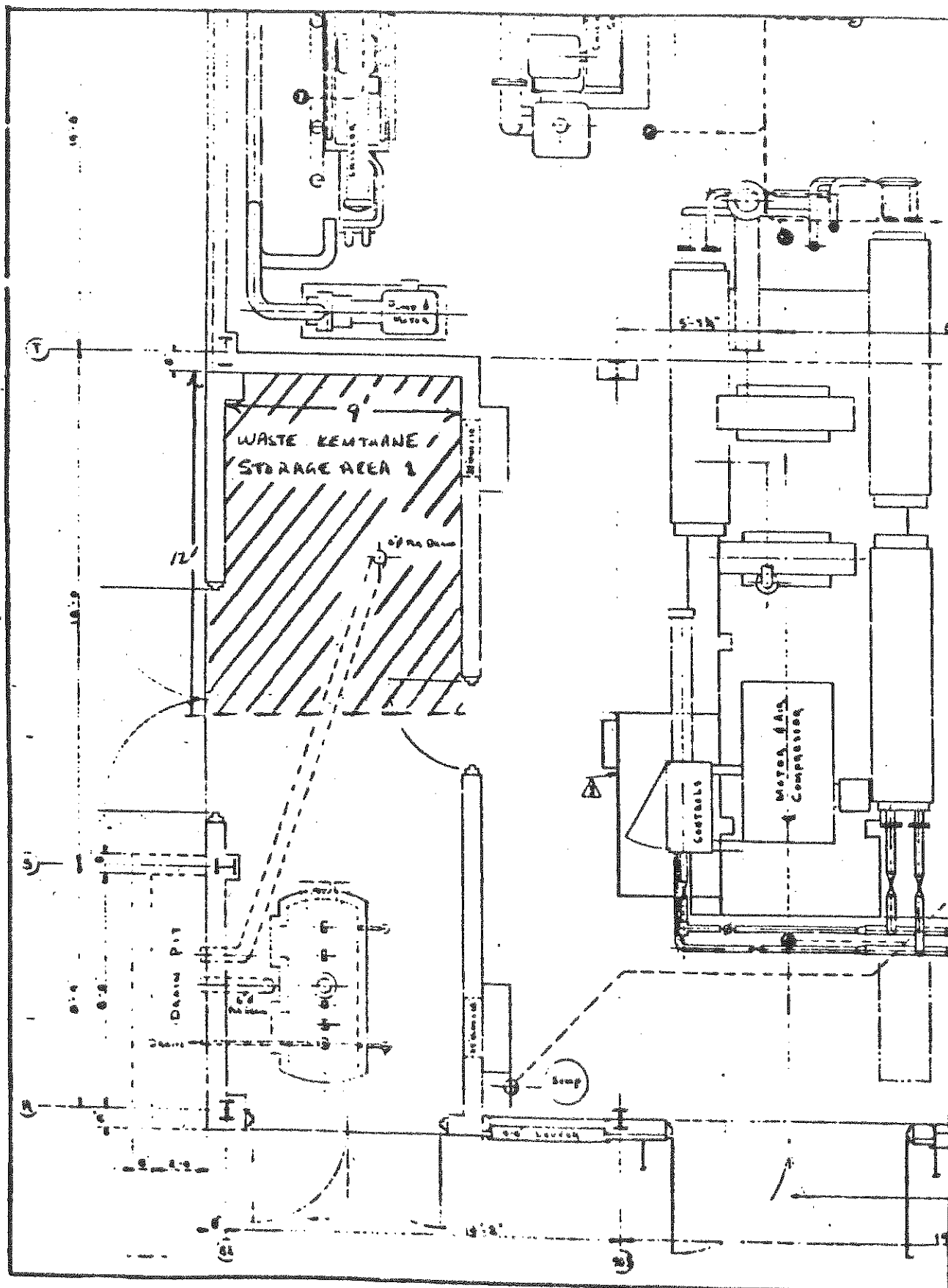
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
E. Masak, Mill Manager	<i>E. Masak</i>	June 28, 1985

X. OPERATOR CERTIFICATION

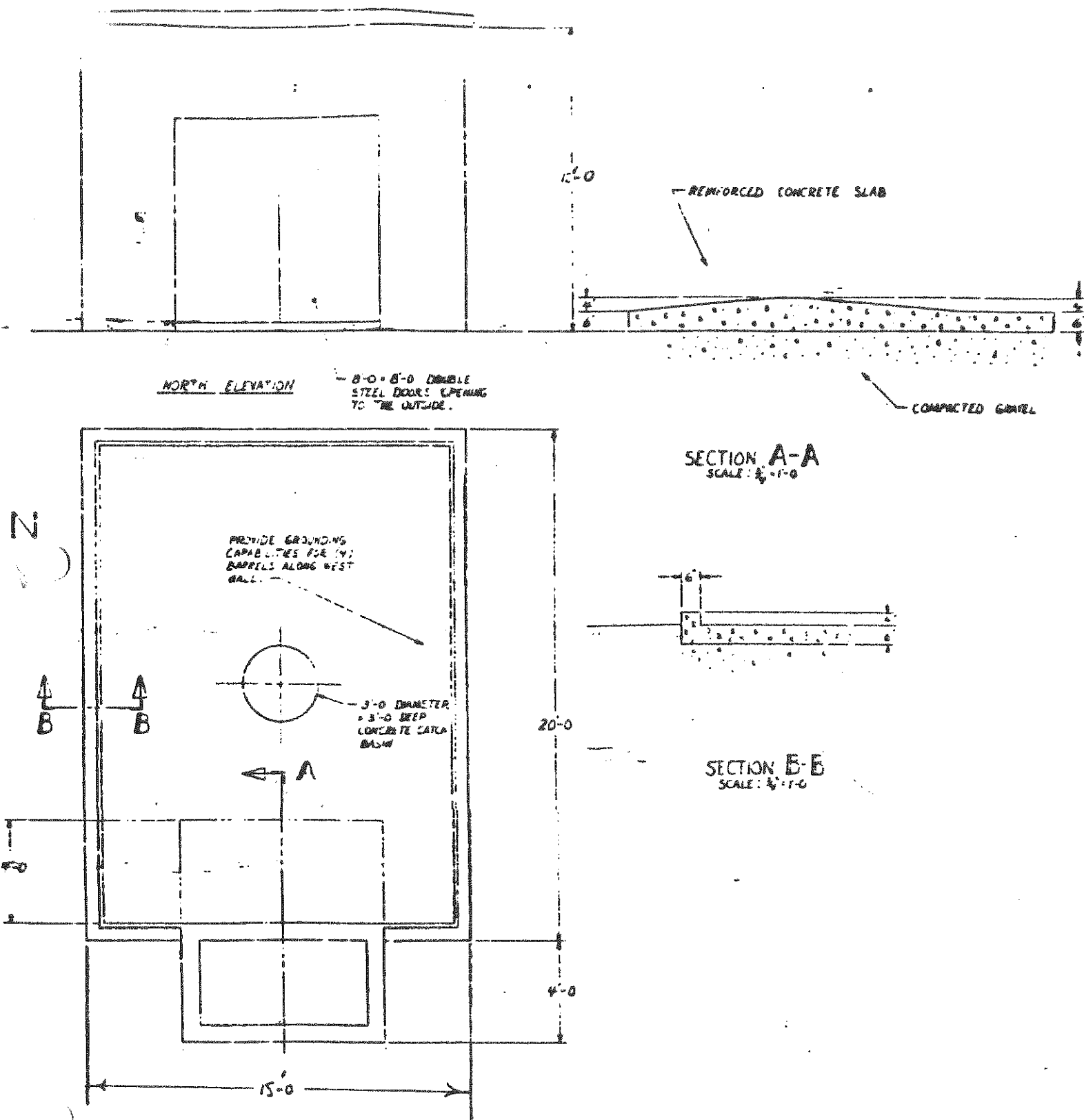
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED





ALCOHOL STORAGE SHED AREA 4



B. Facility Description

B. FACILITY DESCRIPTION

1. General Description

Kimberly-Clark Development Facility North is located in the central part of the city of Neenah, Wisconsin. The street address is:

Development Facility North
1111 South Henry Street
Neenah, WI 54956

The mailing address is:

Development Facility North
1111 South Henry Street
Neenah, WI 54956

The facility is primarily a manufacturer of nonwoven roll goods, sheet goods and tissue and pulp based products for commercial sale or research purposes and involves spent solvents. Hazardous wastes are generated by maintenance, clean-up, process or waste laboratory solvents. Common solvents are employed such as the following:

Methanol
Isopropyl Alcohol
1, 1, 1 Trichloroethane
Mineral Spirits
Hydrocarbon Solvents

Waste heat transfer agent is also generated:

Diethyl Benzene

Contact and party responsible for the hazardous waste management activities at Development Facility North is:

Edward Masak, Jr.
Mill Manager
(414) 721-2937

B. LOCATION INFORMATION

The facility lies in the City of Neenah in a light industrial residential area. (See Part A Permit Information section for the topographic map and photographs - Fig. 1.)

Hazardous Waste Management Facility Boundary:

The hazardous waste management facilities consist of two drum storage areas. All are out of the 100 year flood plain as identified by Zone on attached map Figure 2. Figure 3 shows an annual wind rose of meteorological data collected from 1965 through 1974 at the nearest weather station, approximately 25 miles north of Development Facility North.

Access Control: The facility is surrounded by a fence. A receptionist is situated at the only entrance to the mill during the day. Only authorized personnel are allowed into the mill by the Shift Leader or by electronically controlled entry card issued to authorized personnel only. They must sign in and out and wear a visitor's badge.

Injection and withdrawal wells: The site has no injection wells or withdrawal wells.

Access and Internal Roads: Access to the Facility is off Henry Street at the loading dock (Figure 5). An internal road exists in the rear of the facility; only access to it is off the same controlled entry on Henry Street.

Process Sewers: All nonhazardous process waste is piped to the Neenah-Menasha POTW.

Sanitary Sewer: Waste flows directly to the City of Neenah sanitary sewer system.

External Storm Sewers: Drain into the Fox River.

The sewer system is shown in Figures 6 and 7, respectively.

LIST OF THE FOLLOWING FIGURES:

1. FACILITY PHOTOGRAPHS
2. FLOOD PLAIN MAP
3. WIND ROSE
- 4a, 4b DETAILED CITY SECTION MAP
- 5a, 5b, 5c, 5d, 5e Facility Map & Detailed Drawings
6. CITY SANITARY SEWER MAP
7. CITY STORM SEWER MAP

FIGURE 1
FACILITY PHOTOGRAPHS

AREA 1



AREA 1

AREA 4



AREA 4



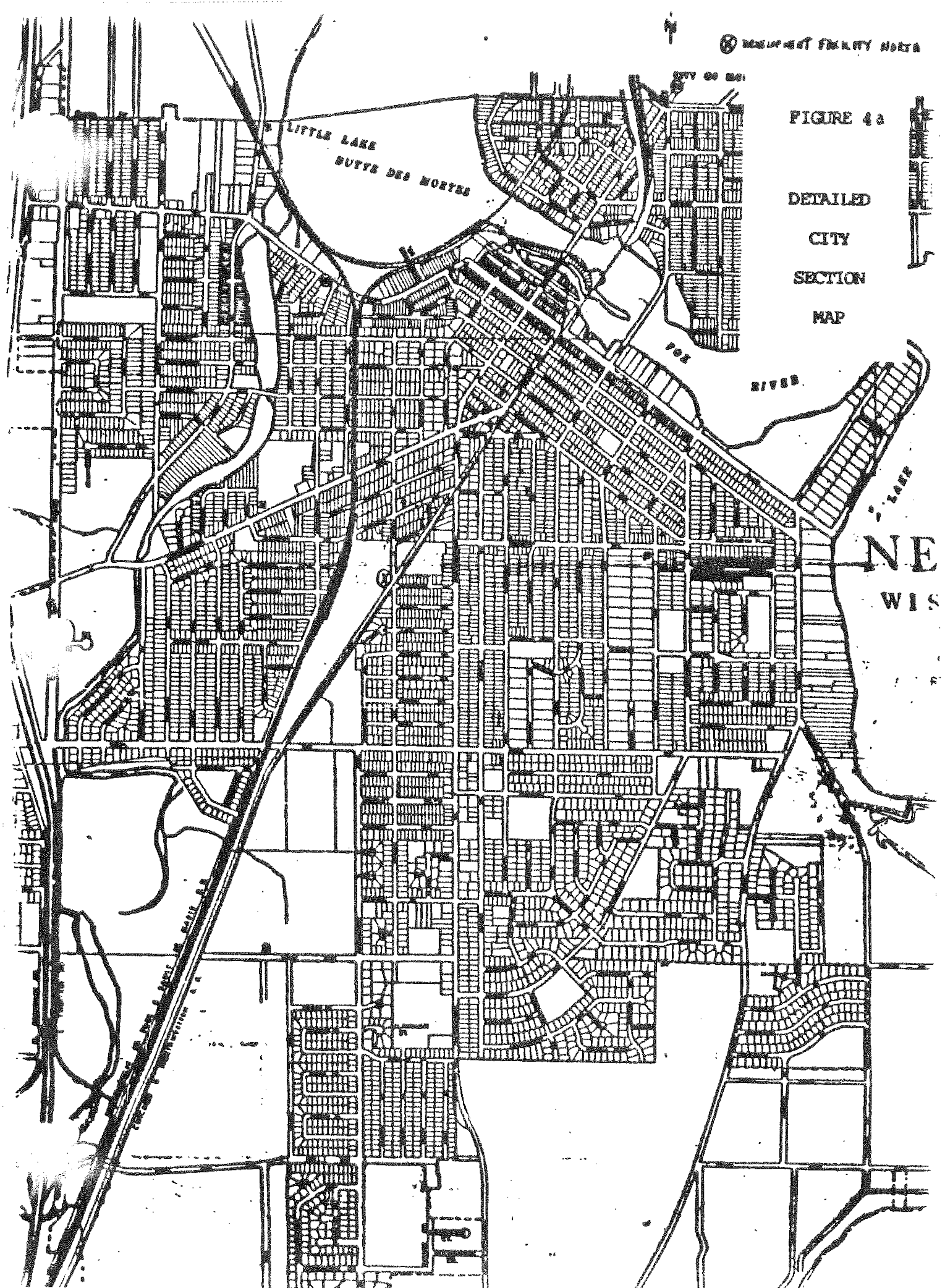
AREA 4

B2 - Figure 2

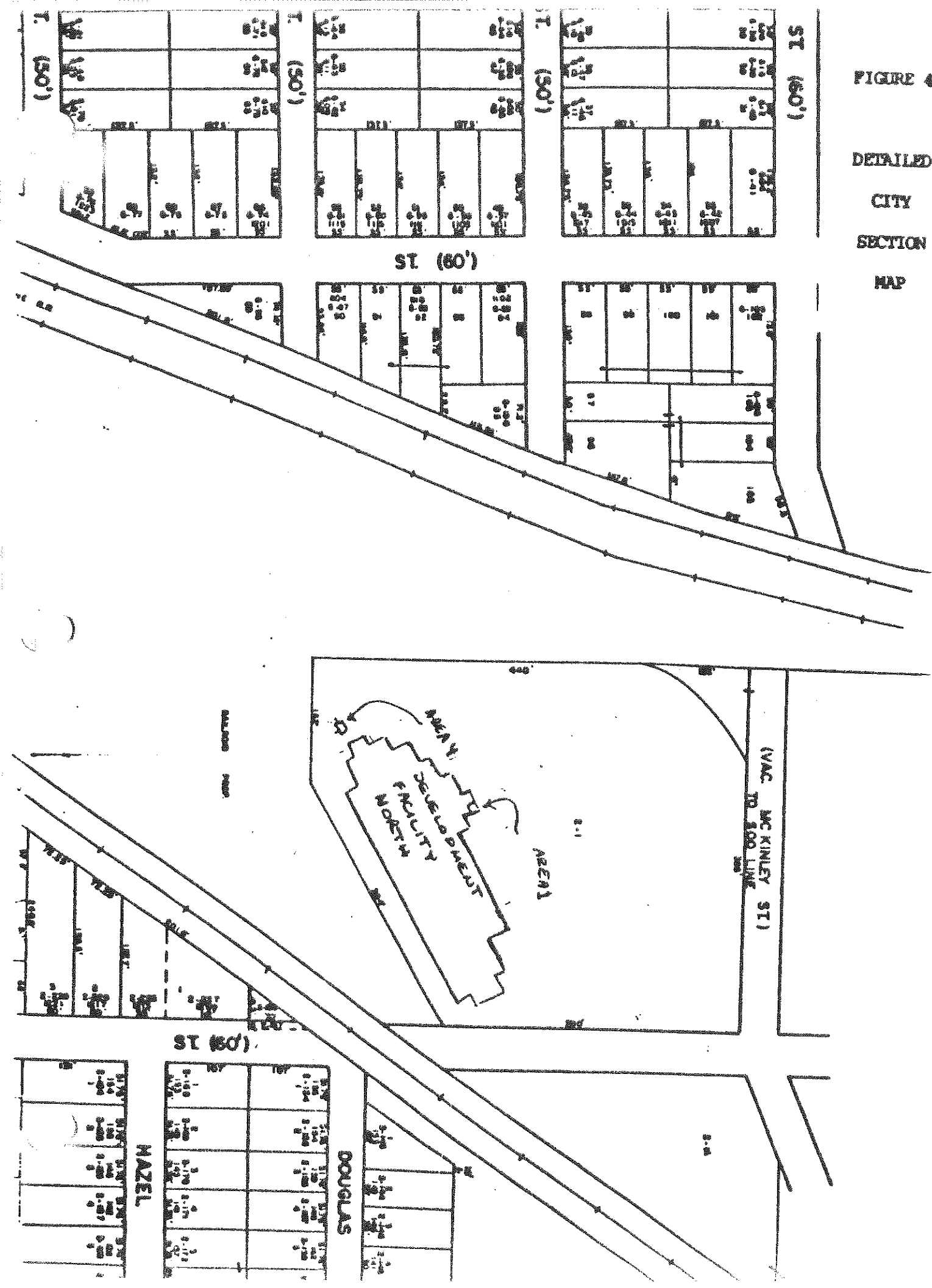
Flood Plain Map submitted previously.

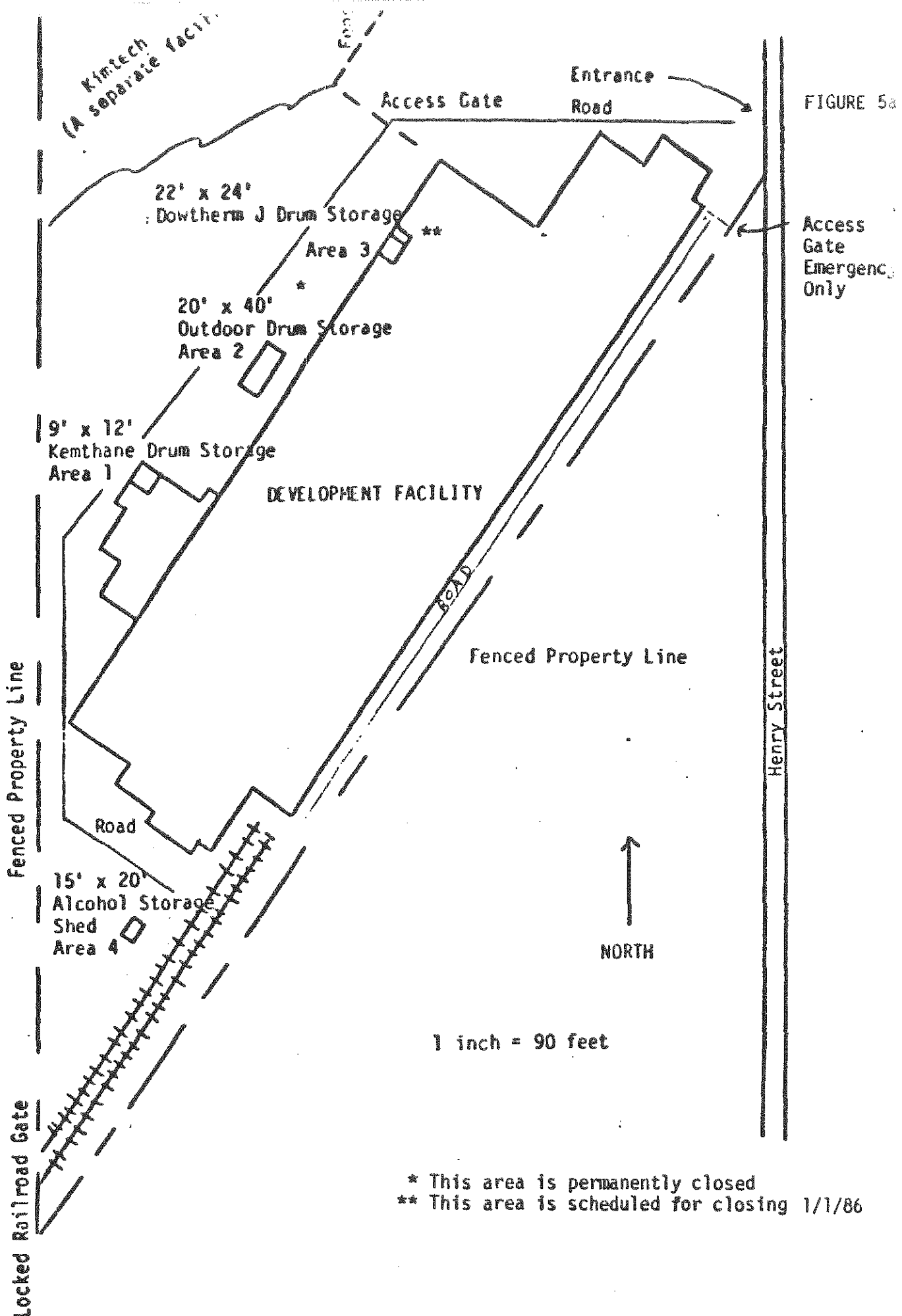
FIGURE 4a

DETAILED
CITY
SECTION
MAP



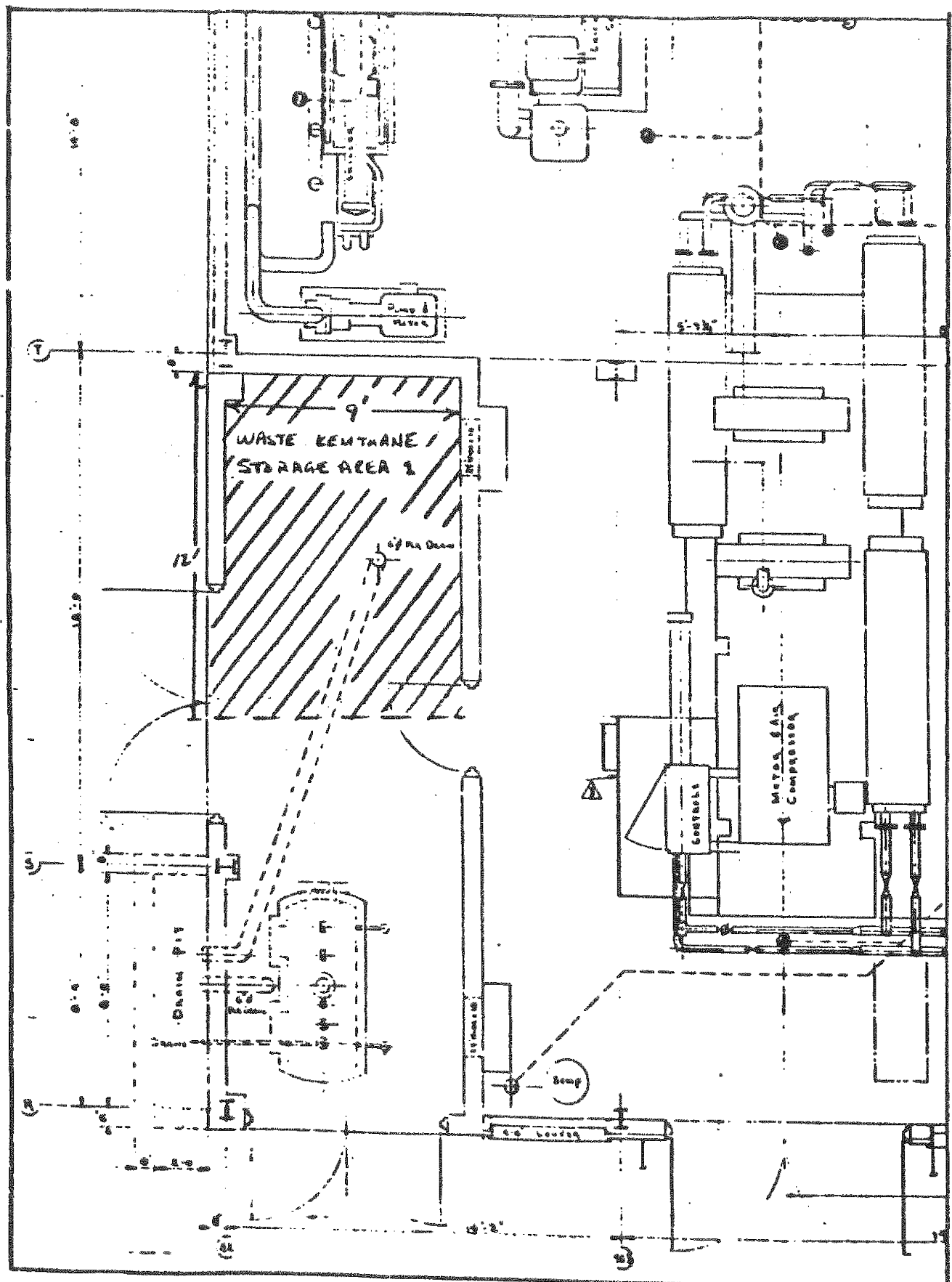
DETAILED
CITY
SECTION
MAP





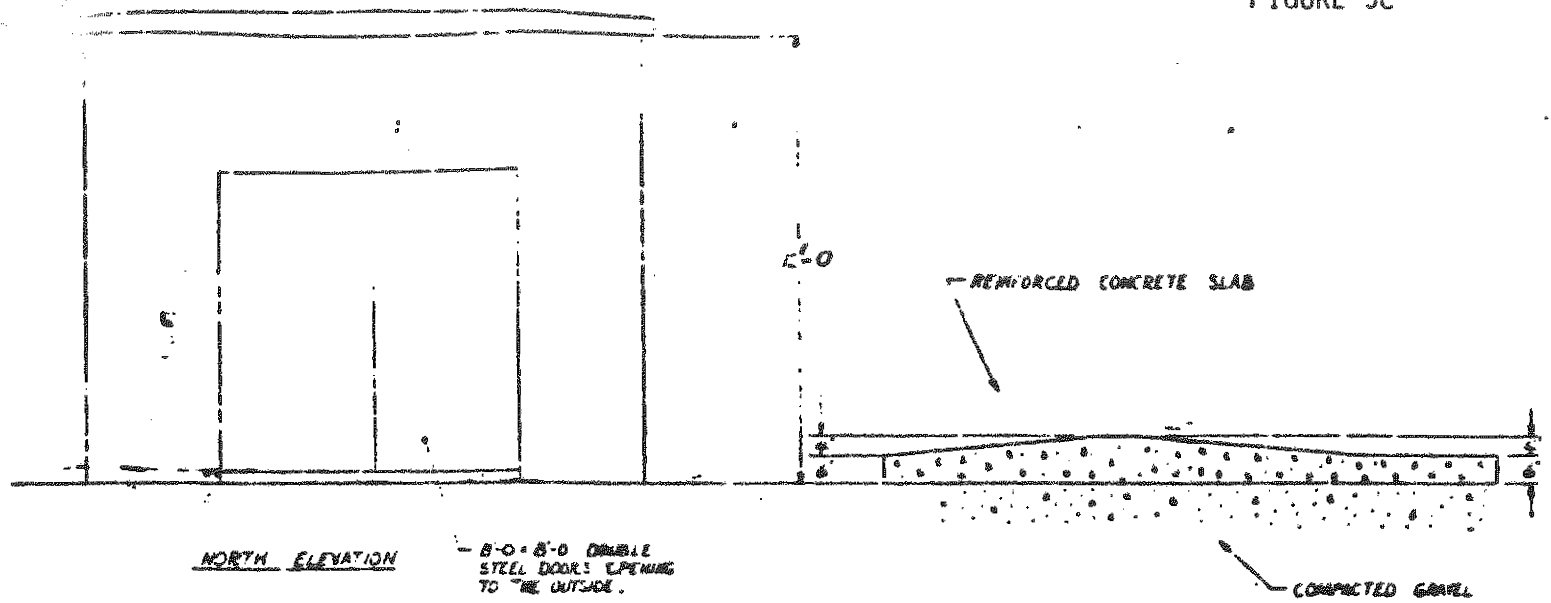
WASTE METHANE STORAGE AREA 1

FIGURE 5b

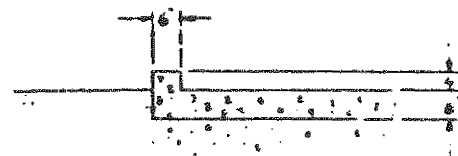


ALCOHOL STORAGE SHED AREA 4

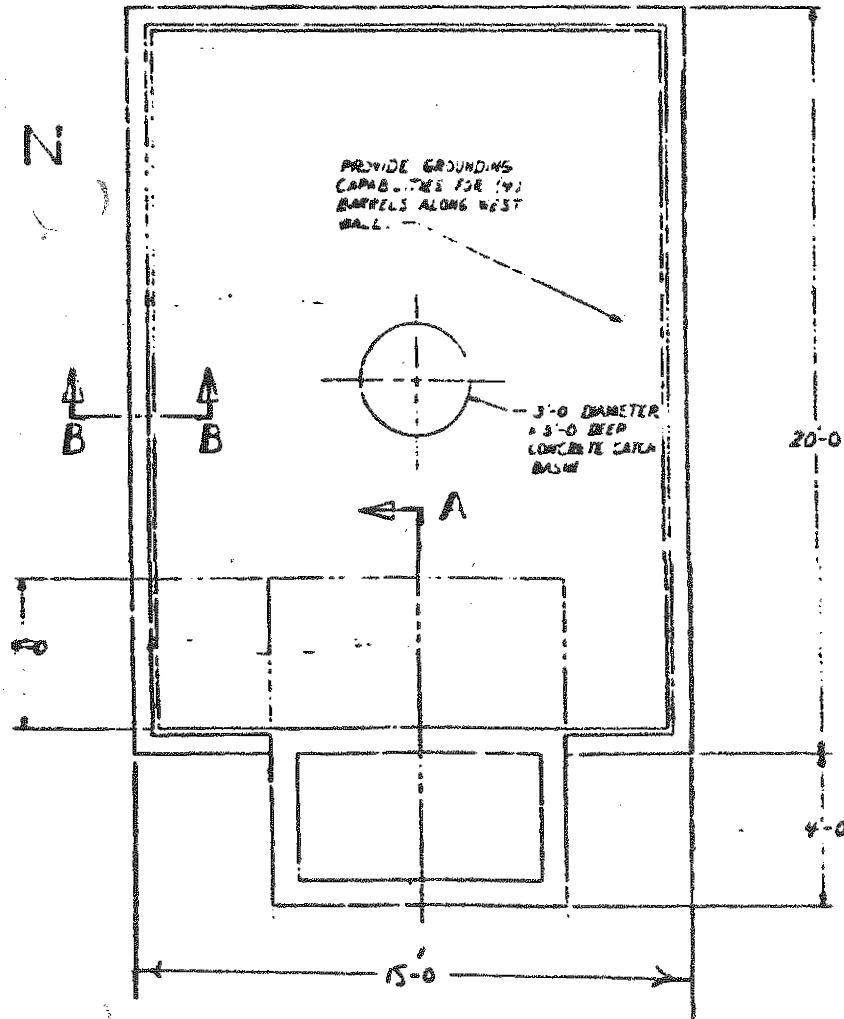
FIGURE 5c



SECTION A-A
SCALE: 1/4" = 1'-0"

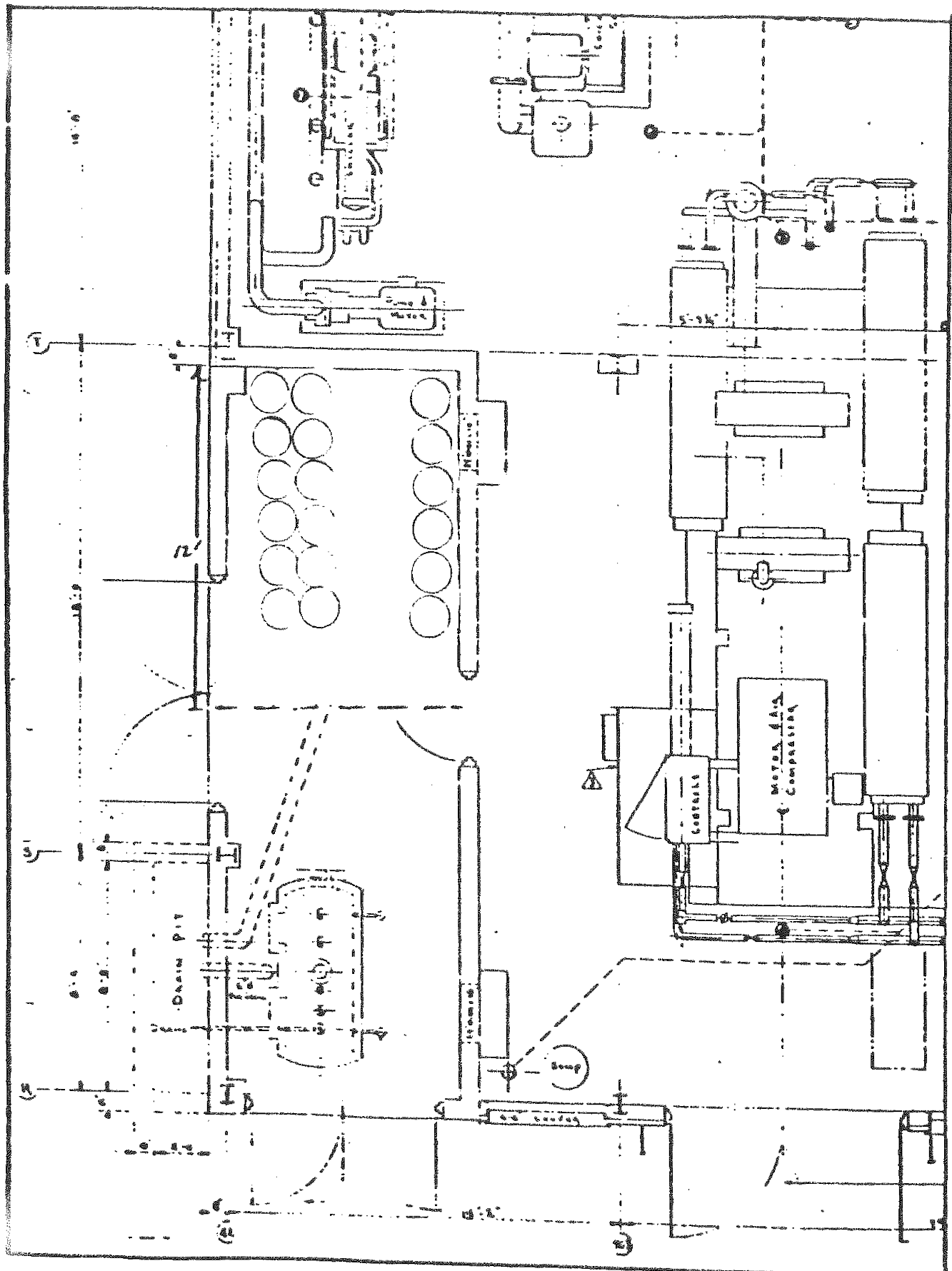


SECTION B-B
SCALE: 1/4" = 1'-0"



DEVELOPMENT FACILITY NORTH
WASTE KEMTHANE STORAGE AREA 1

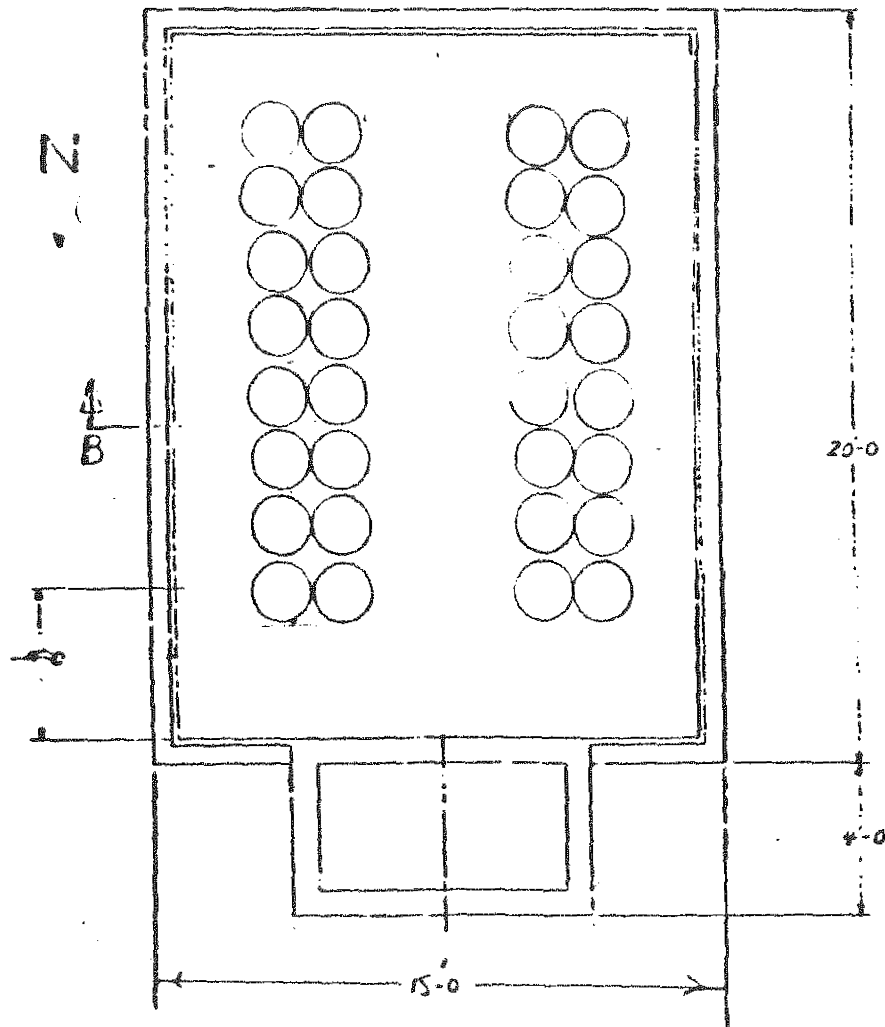
FIGURE 5d



Typical Drum Placement in Storage Area

ALCOHOL STORAGE SHED AREA 4

FIGURE 5e



Typical Drum Placement in
Storage Area

FIGURE 6

SOLID LINES
INDICATE SANITARY
SEWER LOCATIONS

CITY SANITARY
SEWER
MAP

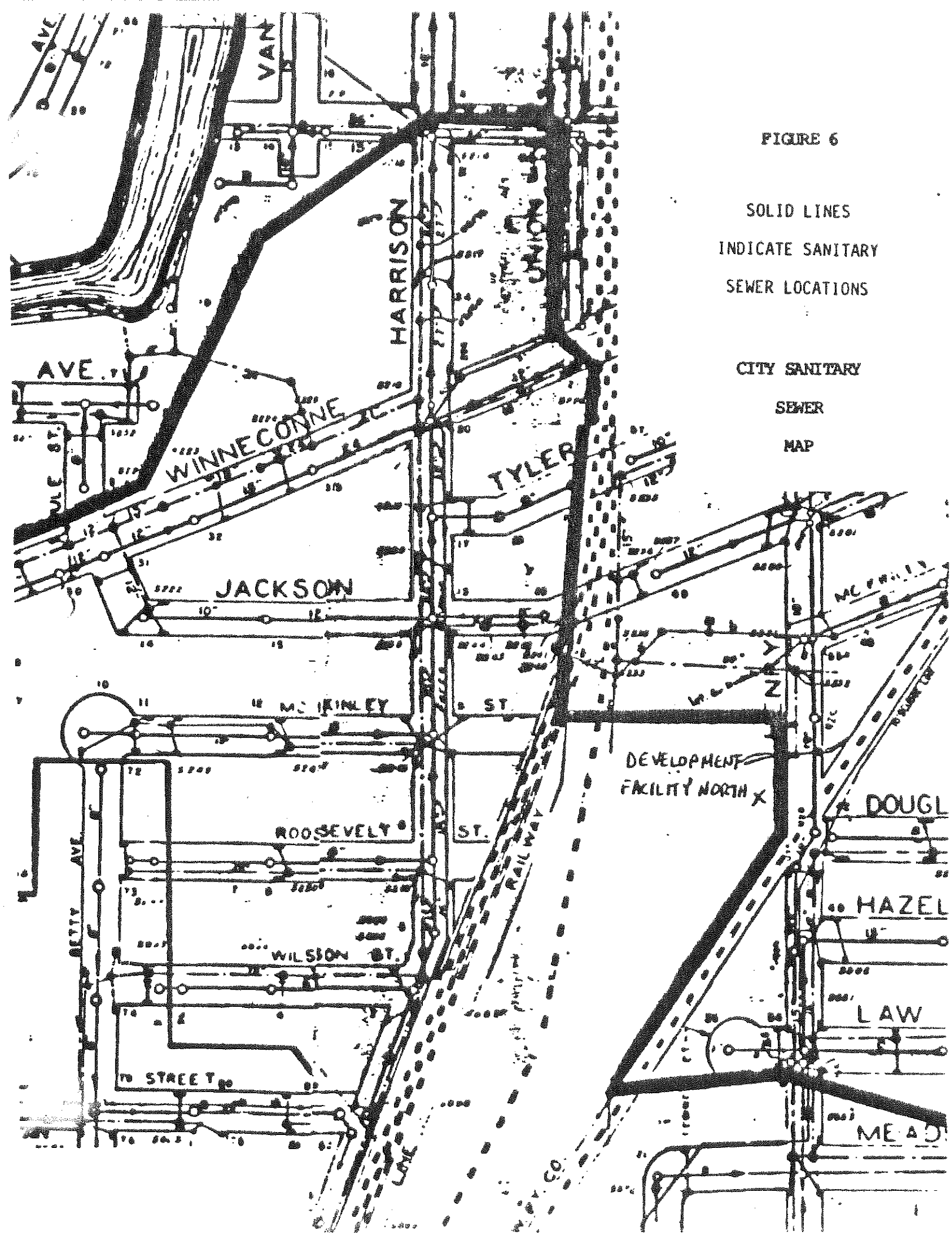
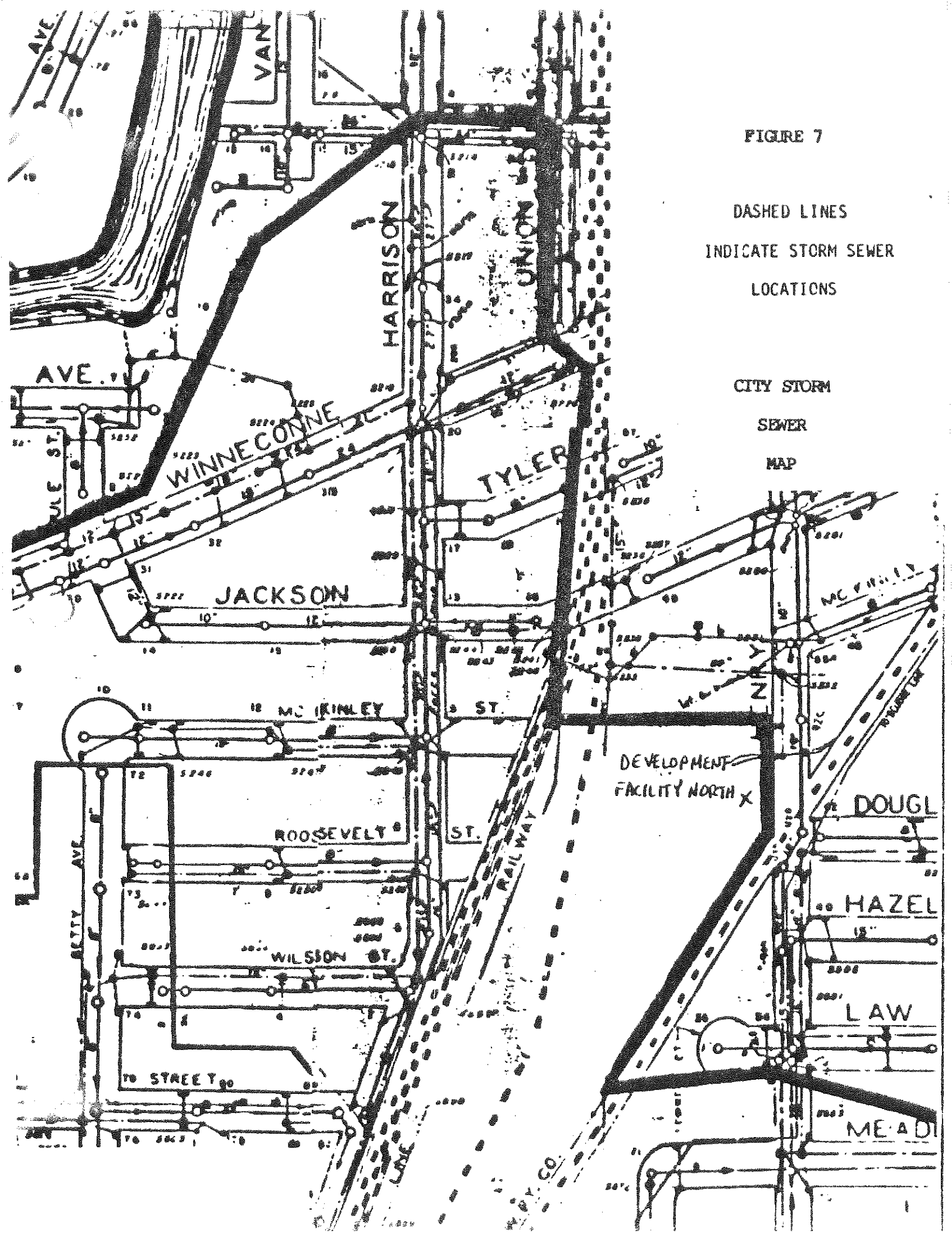


FIGURE 7

DASHED LINES
INDICATE STORM SEWER
LOCATIONS

CITY STORM
SEWER
MAP



Fire Control Facilities: An elaborate network of CO₂ extinguishers, dry chemical extinguishers and 1-1/2" fire hose water systems exist throughout Development Facility North. Development Facility North Fire Procedure Manual is available upon request from the Facility. Refer to the Contingency Plan for fire fighting equipment details.

Flood Control Drainage Barriers: An elaborate system of locks and dams controls this portion of the Fox River. See Figure 2.

3. Location Information

a. Seismic Standard

1. Facility Location Information. The facility is not in an area where the seismic standard applies. It is located in Winnebago County, Wisconsin which is not listed in 40 CFR Part 264 Appendix VI; therefore, it complies.

b. Flood Plain Standard

Facility exists outside 100 year flood plain level.

4. Traffic Patterns

Access to Development Facility North is off Henry Street. One internal road exists in the facility. Employees and truck shippers enter the mill on the east side at the controlled employee/visitor entrance and loading dock respectively. Visitors sign in and out, and are issued a visitor badge and are accompanied at all times by mill personnel. See map on page 10a1 for traffic pattern to storage area and from storage areas to loading dock.

Railroad access to the mill is accomplished via a spur of the Chicago and Northwestern Railroad. It is located along the southeast side of the Facility. A security gate must be opened by authorized personnel to use this spur.

Traffic Control Signals: N/A.

C. Waste
Characteristics

C. WASTE CHARACTERISTICS

1. List of Hazardous Waste Stored at Facility: Hazardous wastes are stored at this facility in 55 gallon drum containers. Current inventory consists of about 10 containers. Halogenated hydrocarbon waste (F001) and ignitable wastes (D001) are generated or stored here. No incompatibility exists involving the wastes. Closed cup flash point of the ignitable waste is below 140°F. See attached analysis A,B.

2. Waste Analysis Plan

a. Parameters and Rationale for their Selection:

<u>Hazardous Waste</u>	<u>Process Generating Waste</u>	<u>Parameter</u>	<u>Rationale</u>
D001 Laboratory, Maintenance solvent liquid mixture, heat transfer agent	Laboratory Testing Painting Cleaning, Contaminated heat Heat Transfer Agent	Ignitability	The waste is listed as hazardous due to flash point in liquid form
F001-Degreasing waste (spent halogenated solvents)	Degreasing	Toxicity	Listed-spent halogenated solvents are found in this waste

- b. Analyses were carried out in accord with U.S. EPA procedures described in 40 CFR Part 265.21

D001 - Ignitability is tested by the closed cup flash point method.

F001, is assumed to be hazardous. Concentrations of specific solvents are determined by GC/MS. Solvent concentrations are estimated using peak retention times and heights to approximate solvent identification and amount.

- c. Sampling Methods: Representative composite grab samples from spent ink solvent drums are taken at the facility. Facility does not analyze waste but submits samples to approved outside laboratories or EPA permitted treatment facilities for analysis. A small hand pump is used to obtain a sample within a barrel after thorough mixing. A composite is obtained from several random barrels. Only Facility personnel, with proper training, perform the sampling procedures. See 7A-7j for specific sampling method.
- d. Frequency of sampling and analysis is yearly. In the event of significant process changes more frequent analyses would be performed at the discretion of facility manager.
- e. Additional requirements for waste generated offsite - N/A. This facility only handles on-site generated wastes.

As described in Title 40 Part 261, App. II, the sampling procedure used is the "COLIWASA" or equivalent method capable of yielding a representative sample within the meaning of Part 260.* For elaboration, the paragraphs which fairly describe the method is included with references to Part 261, App. II and 264.13(b)(4).

* "EPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", July 1982, FW846, 2nd Ed.

§ 264.14

ter, and existing published or documented data on the hazardous waste or on hazardous waste generated from similar processes.

(Comment: For example, the facility's records of analyses performed on the waste before the effective date of these regulations, or studies conducted on hazardous waste generated from processes similar to that which generated the waste to be managed at the facility, may be included in the data base required to comply with paragraph (a)(1) of this section. The owner or operator of an off-site facility may arrange for the generator of the hazardous waste to supply part or all of the information required by paragraph (a)(1) of this section. If the generator does not supply the information, and the owner or operator chooses to accept a hazardous waste, the owner or operator is responsible for obtaining the information required to comply with this section.)

(3) The analysis must be repeated as necessary to ensure that it is accurate and up to date. At a minimum, the analysis must be repeated:

(i) When the owner or operator is notified, or has reason to believe, that the process or operation generating the hazardous waste has changed; and

(ii) For off-site facilities, when the results of the inspection required in paragraph (a)(4) of this section indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper.

(4) The owner or operator of an off-site facility must inspect and, if necessary, analyze each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper.

(b) The owner or operator must develop and follow a written waste analysis plan which describes the procedures which he will carry out to comply with paragraph (a) of this section. He must keep this plan at the facility. At a minimum, the plan must specify:

(1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters (i.e., how analysis for these parameters will provide sufficient information on the waste's prop-

Title 40—Protection of Environment

erties to comply with paragraph (a) of this section;

(2) The test methods which will be used to test for these parameters;

(3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed. A representative sample may be obtained using either:

(i) One of the sampling methods described in Appendix I of Part 261 of this chapter, or

(ii) An equivalent sampling method.

(Comment: See § 260.21 of this chapter for related discussion.)

(4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up to date; and

(5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply.

(6) Where applicable, the methods which will be used to meet the additional waste analysis requirements for specific waste management methods as specified in §§ 264.17 and 264.341.

(c) For off-site facilities, the waste analysis plan required in paragraph (b) of this section must also specify the procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identity of the waste designated on the accompanying manifest or shipping paper. At a minimum, the plan must describe:

(1) The procedures which will be used to determine the identity of each movement of waste managed at the facility; and

(2) The sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling.

(Comment: Part 270 of this chapter requires that the waste analysis plan be submitted with Part B of the permit application.)

[45 FR 33221, May 19, 1980, as amended at 48 FR 2848, Jan. 12, 1983; 48 FR 1678, Jan. 23, 1983; 48 FR 14294, Apr. 1, 1983]

§ 264.14 Security.

(a) The owner or operator must prevent the unknowing entry, and mini-

Chapter I—Environmental Protection Agency

Part 261, App. II

§ 261.13 Discarded commercial chemical products, off-specification species, container residues, sludge, and spill residues thereof.

Hazardous waste No.		Substance
P001	3-(alpha-acetoxymethyl)-4-hydroxycoumarin and salts	
P001	Warfarin	
P122	Zinc phosphide (P ₄)	

APPENDIX I—REPRESENTATIVE SAMPLING METHODS

The methods and equipment used for sampling waste materials will vary with the form and consistency of the waste materials to be sampled. Samples collected using the sampling protocols listed below, for sampling waste with properties similar to the indicated materials, will be considered by the Agency to be representative of the waste.

Extremely viscous liquid—ASTM Standard D140-70 Crushed or powdered material—ASTM Standard D346-75 Soil or rock-like material—ASTM Standard D420-69 Soil-like material—ASTM Standard D1452-65

Fly Ash-like material—ASTM Standard D2234-76 (ASTM Standards are available from ASTM, 1916 Race St., Philadelphia, PA 19103)

Containerized liquid wastes—"COLIWASA" described in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods," U.S. Environmental Protection Agency, Office of Solid Waste, Washington, D.C. 20460. (Copies may be obtained from Solid Waste Information, U.S. Environmental Protection Agency, 26 W. St. Clair St., Cincinnati, Ohio 45268)

Liquid waste in pits, ponds, lagoons, and similar reservoirs—"Pond Sampler" described in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods,"

This manual also contains additional information on application of these protocols.

*These methods are also described in "Samplers and Sampling Procedures for Hazardous Waste Streams," EPA 600/3-80-018, January 1980.

APPENDIX II—EP TOXICITY TEST PROCEDURES

A. Extraction Procedure (EP)

1. A representative sample of the waste to be tested (minimum size 100 grams) shall be obtained using the methods specified in Appendix I or any other method capable of yielding a representative sample within the meaning of Part 260. (For detailed guidance on conducting the various aspects of the EP see "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods" (incorporated by reference, see § 260.11).)

2. The sample shall be separated into its component liquid and solid phases using the method described in "Separation Procedure" below. If the solid residue* obtained using this method totals less than 0.5% of the original weight of the waste, the residue can be discarded and the operator shall treat the liquid phase as the extract and proceed immediately to Step 8.

3. The solid material obtained from the Separation Procedure shall be evaluated for its particle size. If the solid material has a surface area per gram of material equal to, or greater than, 3.1 cm² or passes through a 0.5 mm (0.375 inch) standard sieve, the operator shall proceed to Step 4. If the surface area is smaller or the particle size larger than specified above, the solid material shall be prepared for extraction by crushing, cutting or grinding the material so that it passes through a 0.5 mm (0.375 inch) sieve or, if the material is in a single piece, by subjecting the material to the "Structural Integrity Procedure" described below.

4. The solid material obtained in Step 3 shall be weighed and placed in an extractor with 16 times its weight of deionized water. Do not allow the material to dry prior to weighing. For purposes of this test, an acceptable extractor is one which will impart sufficient agitation to the mixture to not only prevent stratification of the sample and extraction fluid but also insure that all sample surfaces are continuously brought into contact with well mixed extraction fluid.

5. After the solid material and deionized water are placed in the extractor, the opera-

*The percent solids is determined by drying the filter pad at 80°C until it reaches constant weight and then calculating the percent solids using the following equation:
Percent solids =

$$\frac{(\text{weight of pad + solids}) - (\text{tare weight of pad})}{\text{initial weight of sample}} \times 100$$

1.2 Implementation of Sampling Plan

This section describes EPA-approved equipment and procedures for obtaining representative samples of a solid waste. The information in this section is general in nature. Since each specific sampling situation is unique, the equipment and procedures described must be modified appropriately in an actual use situation to ensure that representative samples are collected. It is the responsibility of those persons conducting sampling programs to make the appropriate modifications.

1.2.1 Selection of Sampling Equipment

Sampling the diverse types of RCRA-regulated wastes requires a variety of different types of samplers. Several sampling devices are described in this section. Some of these samplers are commercially available. Others will have to be fabricated by the user. Table 1 is a general guide to the types of waste that can be sampled by each of the samplers described.

1.2.1.1 Composite Liquid Waste Sampler (Coliwasa)

Scope and Purpose

The Coliwasa is a device employed to sample free-flowing liquids and slurries contained in drums, shallow open-top tanks, pits, and similar containers. It is especially useful for sampling wastes that consist of several immiscible liquid phases.

The Coliwasa consists of a glass, plastic, or metal tube equipped with an end closure which can be opened and closed while the tube is submerged in the material to be sampled.

The Coliwasa was developed by the California Department of Health under a grant from the U.S. EPA. A more detailed discussion of the Coliwasa can be found in the Department of Health's report "Samplers and Sampling Procedures for Hazardous Waste Streams," Grant No. R804692010, MERL, USEPA, Cincinnati, Ohio. A modification of the device is described in "Evaluation of the Procedures for Identification of Hazardous Wastes," by L.R. Williams et al. (EPA/EMSC, Las Vegas, Nevada).

It should be mentioned that some experienced sampling personnel find the Coliwasa cumbersome and difficult to clean or dispose of following use.

General Comments and Precautions

1. Do not use a plastic Coliwasa, unless it is constructed of fluorocarbons (e.g., Teflon), to sample wastes containing organic materials.

TABLE 1. SAMPLING EQUIPMENT FOR PARTICULAR WASTE TYPES

Waste type	Waste location or container								
	Drum	Sacks and bags	Open bed truck	Closed bed truck	Storage tanks or bins	Waste piles	Ponds, lagoons, & pits	Conveyor belt	Pipe
Free flowing liquids and slurries	Collwasa	N/A	N/A	Collwasa	Weighted bottle	N/A	Dipper	N/A	Dipper
Sludges	Trier	N/A	Trier	Trier	Trier	a	a		
Moist powders or granules	Trier	Trier	Trier	Trier	Trier	Trier	Trier	Shovel	Dipper
Dry powders or granules	Thief	Thief	Thief	Thief	Thief	Thief	Thief	Shovel	Dipper
Sand or packed powders and granules	Auger	Auger	Auger	Auger	a	a	a	Dipper	Dipper
Large grained solids	Large Trier	Large Trier	Large Trier	Large Trier	Large Trier	Large Trier	Large Trier	Trier	Dipper

^aThis type of sampling situation can present significant logistical sampling problems, therefore sampling equipment must be specifically selected or designed based on site and waste conditions. No general statement about appropriate sampling equipment can be made.

Equipment / 3

2. Do not use a glass Coliwasa to sample liquids that contain hydrofluoric acid.
3. If significant amounts of solid material are present within 2 inches of the bottom of the container to be sampled, special procedures will be necessary to obtain a representative sample of this solid phase.

Apparatus

Coliwases are available commercially (NASCO) or can be fabricated to conform to the specifications detailed in Figure 1. Table 2 lists the parts required to fabricate a plastic or glass Coliwasa.

Assembly

Assemble Coliwasa sampler as follows:

1. Attach swivel to the T-handle with the 3.12-cm-long bolt and secure with the 3/16-in. NC washer and lock nut.
2. Shape stopper into a cone by boring a 0.95-cm hole through the center of the stopper. Insert a short piece of 0.95-cm-O.D. handle through the hole until the end of the handle is flush against the bottom (smaller diameter) surface of the stopper. Carefully and uniformly turn the stopper into a cone against a grinding wheel. This is done by turning the stopper with the handle and grinding it down conically from about 0.5 cm of the top (larger diameter) surface to the edge of the 0.95-cm-hole on the bottom surface. Attach neoprene stopper to one end of the stopper rod and secure with the 3.8-in. NC washer and lock nut.
3. Install the stopper and stopper rod assembly in the sampling tube.
4. Secure locking block sleeve on the block with glue or screws.
5. Position the locking block on top of the sampling tube so that the sleeveless portion of the block fits inside the tube, the sleeve sits against the top end of the tube, and the upper end of the stopper rod slips through the center hold of the block.
6. Attach the upper end of the stopper to the swivel of the T-handle.
7. Place the sampler in the closed position and adjust the tension on the stopper by screwing the T-handle in or out.
8. Test the tension by filling the Coliwasa with water to ensure that it is leak free.

4 / SAMPLING - Implementation

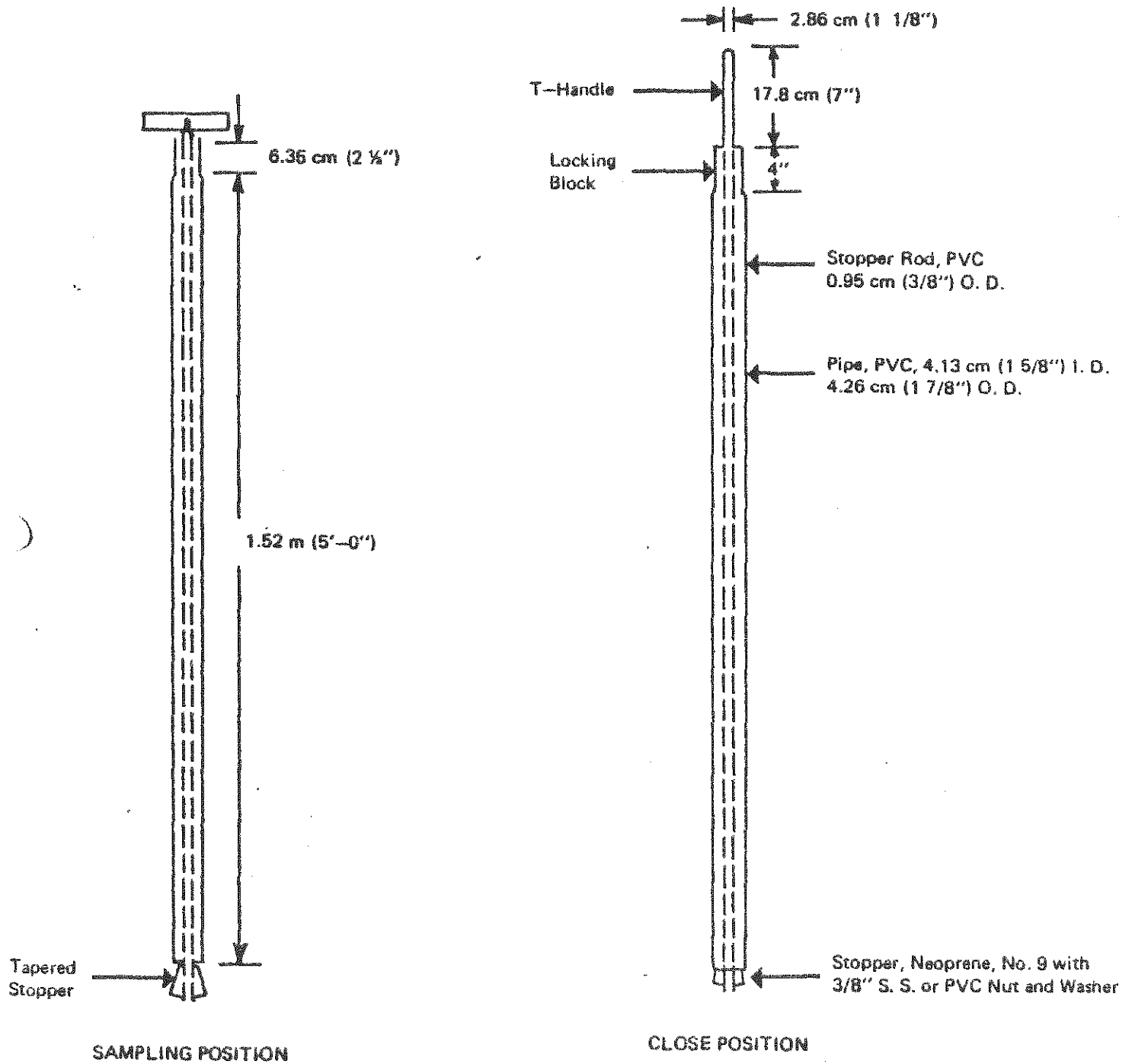


Figure 1. Composite liquid waste sampler (Coliwasa).

TABLE 2. PARTS FOR CONSTRUCTING A COLIWASA

Quantity	Item	Comments	Supplier
1	Sample tube, translucent PVC plastic, 4.13 cm I.D. x 1.52 m long x 0.4 cm wall thickness	Plastic Coliwasa only	Plastic supply houses
1	Sample tube, borosilicate glass, 4.13 cm I.D. x 1.52 m long	Glass Coliwasa only	Corning Glass Works #72-1602
1	Stopper, neoprene rubber #9		Laboratory supply house
1	Stopper rod, PVC, 0.95 cm O.D. x 1.67 m long	Plastic Coliwasa only	Plastic supply houses
1	Stopper rod, teflon, 0.95 cm O.D. x 1.67 m long	Glass or Plastic Coliwasa	Plastic supply houses
1	Locking block, PVC, 3.8 cm O.D. x 10.2 cm long with 0.56-cm hole in center	Fabricate by drilling 0.56-cm hole through center	Plastic supply houses
1	Locking block sleeve, PVC, 4.13 cm I.D. x 6.35 cm long	Fabricate from stock 4.13-cm PVC pipe	Plastic supply houses
1	T-handle, aluminum, 18 cm long x 2.86 cm wide with 1.27-cm-wide channel	Fabricate from aluminum bar stock	Hardware stores
1	Swivel, aluminum bar 1.27 cm square x 5.08 cm long with 3/8-in. NC inside thread to attach stopper rod	Fabricate from aluminum bar stock	Hardware stores

6 / SAMPLING - Implementation

TABLE 2 (CONT.)

Quantity	Item	Comments	Supplier
1	Nut, PVC, 3/8 in. NC		Plastic supplier
1	Washer, PVC, 3/8 in. NC		Plastic supplier
1	Nut, stainless steel, 3/8 in. NC		Hardware stores
1	Washer, stainless steel, 3/8 in.		Hardware stores
1	Bolt, 3.12 cm long x 3.16 in. NC		Hardware stores
1	Nut, 3/16 in. NC		Hardware stores
1	Washer, lock 3/16 in.		Hardware stores

Procedure

1. Clean Coliwasa.
2. Adjust sampler's locking mechanism to ensure that the stopper provides a tight closure. Open sampler by placing stopper rod handle in the T-position and pushing the rod down until the handle sits against the sampler's locking block.
3. Slowly lower the sampler into the waste at a rate that permits the level of liquid inside and outside the sampler to remain the same. If the level of waste in the sampler tube is lower inside than outside, the sampling rate is too fast and will produce a nonrepresentative sample.
4. When the sampler hits the bottom of the waste container, push sampler tube down to close and lock the stopper by turning the T-handle until it is upright and one end rests on the locking block.
5. Withdraw Coliwasa from waste and wipe the outside with a disposable cloth or rag.

Note: The procedure discussed above should be used on all four types of wastes. It is planned to sample at least every third drum of waste, if there is a reason to believe that there has been a significant change in the waste's characteristics from the original description given in this application.

WASTE
ANALYSIS



HYDRITE CHEMICAL CO.

March 27, 1985

P.O. BOX 158 COTTAGE GROVE, WISCONSIN 53527-0158 608/257-5892

WASTE SOLVENT SAMPLE ANALYSIS REPORT

ANALYSIS

DATE: March 26, 1985

CODE NO.: 5654---10

COMPANY: K. Clark Atlas Mill

Appleton, WI

SITE: 1,1,1 Trichloroethane
(Use)% RECOVERY 75 ± 5
(Distillation)

METHOD

Chromatographic

pH 6.6

Sulfuric Acid

Acid Acceptance

Other

(Wd = 1.234)

LABEL: Non-flammable

SALESPERSON: Dick Terry

Processing Classifications:

Purchase; Acquire

Comments:

DOT Proper Shipping Name: Waste

1,1,1 Trichloroethane

DOT Hazard Class: ORM-A

UN/NA No.: UN 2831

EPA Waste Code No. F002

Analysis No.: 503055 rd

Actives:

☒ Acetone
☒ Methyl Ethyl Ketone
☒ Ethyl Acetate
☒ Glycol Ether EM
☒ Isopropyl Acetate
☒ n-Propyl Acetate
☒ Glycol Ether EE
☒ Methyl Isobutyl Ketone
☒ Isobutyl Acetate
☒ n-Butyl Acetate
☒ Glycol Ether EEAc
☒ Glycol Ether EB
☒

Alcohol:

☒ H₂O
☒ Methanol
☒ Ethanol
☒ Isopropanol
☒ n-Propanol
☒ Isobutanol
☒ n-Butanol
☒
☒

Diluents:

☒ Toluene
☒ Xylene
☒ Mineral Spirits
☒ Stoddard Solvent
☒ VM&P Naphtha
☒ Heptane
☒ Hexane
☒

Chlorinated:

☒ Methylene Chloride
 100 ☒ 1,1,1 Trichloroethane
☒ Trichloroethylene
☒ Perchloroethylene
☒ (1,1,2-Trichloro-
 1,2,2-Trifluoroethane)
☒

Other:

☒

WASTE ANALYSIS

"FLASH POINT"



BADGER LABORATORIES & ENGINEERING

CO.
INC.

1110 S ONEIDA STREET • APPLETON, WISCONSIN 54915 • (414) 739-0213

TOLL FREE PHONE IN WISCONSIN 1-800-243-3555

Your Purchase Order No. DF 25127

Two (2) Waste Samples

Received May 28, 1985

Our Report No. 151550

Issued June 13, 1985

KIMBERLY-CLARK CORPORATION
Development Facility North
1111 Henry Street
Neenah, WI 54956

Att'n: Mr. John C. Eckert

Request: Flash point percent volatile determination on the above samples.

Results:

Waste Hydro Degreaser

Flash Point (Closed Cup) °F	470
% Volatile @ 103°C	95.6
% Remaining (Oil)	4.4

Waste Alcohol

Flash Point (Closed Cup) °F	470
% Volatile @ 103°C	99.6
% Remaining	0.4

Method: Flash Point - Pensky Martin Closed Cup Flash Tester.
Volatiles - Oven Dry 103°C.

BADGER LABORATORIES & ENGINEERING

Stephen C. Taylor
Chief Chemist

SCT:mw

D. Process Information

D. PROCESS INFORMATION

Containers

There are two storage locations both of which are totally enclosed:

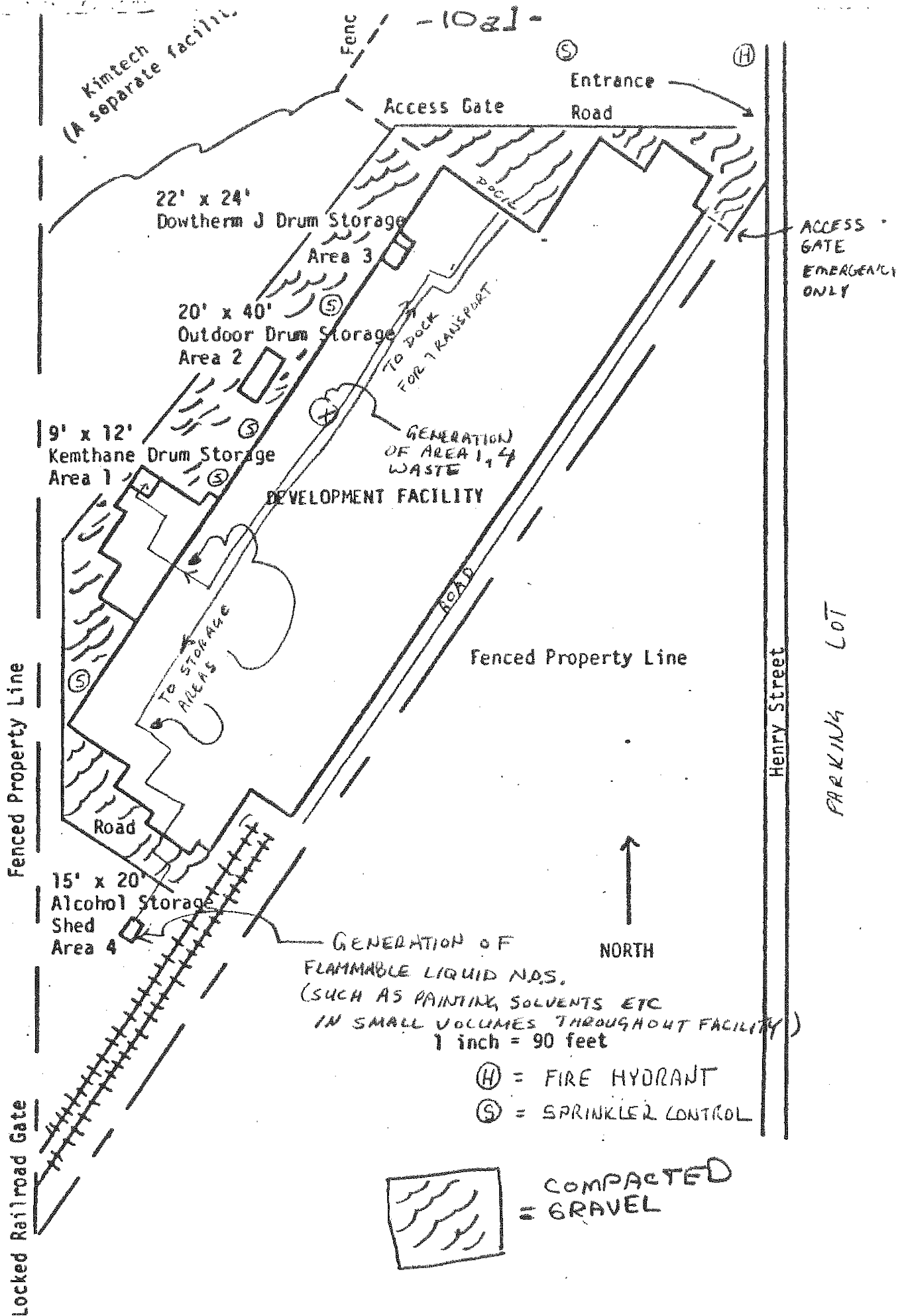
1. Waste Kemthane Storage Area 1.
 - a. area - 108 ft^2 (9 ft x 12 ft)
 - b. capacity - 15 drums (55 gallon) = 825 gallons
2. Alcohol storage shed Area 4
 - a. area - 300 ft^2 (15 ft x 20 ft)
 - b. capacity - 25 drums (55 gallon) = 1375 gallons

Area 1 is protected by the facility's automatic sprinkling system, portable dry chemical extinguishers and the 1.5 inch fire hose system. Area 4 is protected by a dry chemical extinguisher, alarm system and 1-1/2 inch fire hose system. Current facility security is already in existence (see Figure 5). Areas are diked and have catch basins described later in this section.

1. Description of Containers: Steel 55 gallon drums are used at this facility to store the waste listed above under waste characteristics. Drums meet DOT Spec. 17C. As allowed by DOT regulations 49 CFR 173.28 (p).
 - Reuse of packaging (containers), the same drums used for incoming raw materials are reused once for storing and transporting hazardous waste. The guidelines shown on Page 10b are used (49 CFR 173.28) (p).
2. Container management practices: Prior to transfer to container storage area, wastes generated in the processing area are placed in steel drums. Transfer of waste to the container storage area is accomplished by fork lift truck or drum hand cart. At the Development Facility North storage areas, there are no sources of ignition such as an open flame. Smoking is prohibited. Only D.O.T. approved drums are used. Good housekeeping procedures are followed at all times.

The drums may be stacked 8 ft. high (2 drums). Primary aisle space of at least 3 ft. is maintained at all times, and the container storage area is inspected regularly.
3. Secondary Containment System Design and Operation: The entire facility is bounded by an 8 ft. high chain link security fence and the secured process building. The bases of these areas are free of gaps and impervious to the wastes being stored.
4. DOT Regulations: DOT instructions (packaging, labeling, marking, and placarding) are shown on pages 10c - 10k with one example shown.
5. Aisle space: Sufficient aisle space is maintained in the storage areas to allow easy accessibility of any leaking drum(s). See Figs. 5d and 5e.)

6. On-Site Traffic Pattern: Traffic aisles are clearly designated throughout most of major operating areas in the facility. No railroad tracks are crossed at any aisle. Adequate aisle space is always maintained in the storage areas for quick accessibility of any leaking drums (See Figs. 5d and 5e). See page 10a1 for map showing detailed traffic patterns to storage and loading areas.
7. Estimated Traffic Volume: Normal hazardous waste generated is 1-2 55-gallon drums a month. This material is transported to one of the storage areas prior to eventual loading onto a truck for transport to a designated hazardous waste treatment or disposal facility.
8. Scheduling of On-Site Transportation: Hazardous waste is transported during normal operating hours which occur approximately once or twice per month. Proper lighting is required where necessary.
9. Access Road Surfacing and Load Bearing Capacity: All surfaces in the storage areas are concrete. All surfaces within the operating plant are concrete and at grade (no basements). All other areas which would handle vehicle traffic handling hazardous waste, would be either blacktop or compacted gravel. All roads are maintained in good repair. See map on page 10a1.



Department of Transportation Regulation
Covering Reuse of Packaging Material

49 CFR 173.28 (p)

(p) A packaging marked NRC or STC according to the specification requirements of Part 178 of this subchapter may be reused for the shipment of hazardous waste to designated facilities subject to the following conditions:

(1) Except as authorized by this paragraph, the waste must be packaged in accordance with this Part and offered for transportation in accordance with the requirements of this subchapter.

(2) Transportation is performed by highway only.

(3) A package is not offered for transportation less than 24 hours after it is finally closed for transportation, and each package is inspected for leakage immediately prior to being offered for transportation.

(4) Each package is loaded by the shipper and unloaded by the consignee, unless the motor carrier is a private or contract carrier.

(5) The packaging may be used only once under this paragraph and may not be used again for shipment of hazardous materials except in accordance with paragraph (m) or (n) of this section.

III. DOT HAZARDOUS TABLE

A. Instructions for Using the DOT Hazardous Material Table (condensed)

HAZARDOUS MATERIALS TABLE
Department of Transportation Regulations
49 CFR 172.101

The information contained in 49 CFR Table 172.101 is used for completing the shipping paper, marking, labeling, and placarding requirements for the shipment of hazardous materials. Below is a shortened discussion of each column as presented in this Table:

COLUMN (1) - No Title

1. A (+) fixes the hazard class for a material even though it does not meet the definition of that class.

Example: "Hydrocarbon Gas, Non-Liquefied" is assigned the hazard class "Flammable gas" even though the physical properties of the specific gas may not place it into the "Flammable Gas" category.

2. A single letter "A" indicates that this table must be used only if these materials are shipped by air. However, if the material is a hazardous waste, this Table must be used regardless.
3. A single letter "W" indicates that this table must be used only if these materials are shipped by water. However, if the material is a hazardous waste, this Table must be used regardless.
4. A single letter "E" indicates that the material is a hazardous substance with the additional following requirements:
 - a. The letters "RQ" (Reportable Quantity) in the shipping name if the amount being shipped is equal to or greater than the amount shown in parentheses (lbs/kilograms).
 - b. A report must be filed with the appropriate regulatory agency if a spill occurs during shipment. A generator should confirm that the transporter is knowledgeable of what his responsibilities are. See 171.17 (pages 36 & 37).
 - c. If the shipping quantity is less than the RQ amount, the material is shipped as a hazardous material but without the added requirements of a "RQ" material.

§ 171.16

(6) Classification, name, and quantity of hazardous materials involved, if such information is available.

(7) Type of incident and nature of hazardous material involvement and whether a continuing danger to life exists at the scene.

(c) Each carrier making a report under this section shall also make the report required by § 171.16.

(49 U.S.C. 1803, 1804, 1806; 49 CFR 1.53 and App. A to Part 1)

(Amdt. 171-7, 35 FR 16837, Oct. 3, 1970)

EDITORIAL NOTE: For Federal Register citations affecting § 171.15, see the List of CFR Sections Affected appearing in the Finding Aids section of this volume

§ 171.16 Detailed hazardous materials incident reports.

(a) Each carrier who transports hazardous materials shall report in writing in duplicate on DOT Form F 5800.1^{*} to the Department within 15 days of the date of discovery, each incident that occurs during the course of transportation (including loading, unloading, or temporary storage) in which, as a direct result of the hazardous materials, any of the circumstances set forth in § 171.15(a) occurs or there has been an unintentional release of hazardous materials from a package (including a tank) or any quantity of hazardous waste has been discharged during transportation. If a report pertains to a hazardous waste discharge—

(1) A copy of the hazardous waste manifest for the waste must be attached to the report, and

(2) An estimate of the quantity of the waste removed from the scene, the name and address of the facility to which it was taken, and the manner of disposition of any unremoved waste, must be entered in Part H of the report (Form F 5800.1).

(b) Each carrier making a report under this section shall send that report to the Information Systems Manager, Materials Transportation Bureau, Department of Transportation, Washington, D.C. 20590.

(c) Except as provided in paragraph (d) of this section, the requirements of paragraph (a) of this section do not

^{*}Filed as part of the original document.

Title 49—Transportation

apply to incidents involving the unintentional release of hazardous materials being transported under the following proper shipping names:

(1) Consumer commodity

(2) Battery, electric storage, wet, filled with acid or alkali.

(3) Paint and paint related material when shipped in packagings of five gallons or less.

(d) The exceptions to incident reporting provided in paragraph (c) of this section do not apply to:

(1) Incidents required to be reported under § 171.15(a);

(2) Incidents involving transportation aboard aircraft; nor

(3) Incidents involving the transportation of hazardous waste.

(49 U.S.C. 1803, 1804, 1806; 49 CFR 1.53 and App. A to Part 1)

(Amdt. 171-7, 35 FR 16837, Oct. 3, 1970, as amended by Amdt. 171-56, 45 FR 73683, Nov. 6, 1980; Amdt. 171-57, 45 FR 80828, Dec. 8, 1980; Amdt. No. 171-65, 47 FR 24584, June 7, 1982; Amdt. 171-66, 47 FR 43044, Sept. 30, 1982; Amdt. 171-72, 48 FR 17095, Apr. 21, 1983)

EFFECTIVE DATE NOTE: In § 171.16, paragraph (c)(3) was revised at 48 FR 17095, Apr. 21, 1983, effective April 1, 1984. For the convenience of the user, the superseded text appears below.

§ 171.16 Detailed hazardous materials incident reports.

(c) . . .

(3) Paint, Enamel, Lacquer, Stain, Shellac or Varnish Aluminum, Bronze, Gold, Wood filler, liquid or Lacquer base liquid when shipped in packagings of five gallons or less.

§ 171.17 Hazardous substance discharge notification.

(a) When a hazardous substance is discharged in a reportable quantity from one package or transport vehicle if not packaged (accidentally or intentionally) into or upon the navigable waters or adjoining shorelines, the person in charge of the aircraft, vessel, transport vehicle or facility shall, as soon as that person has knowledge of such discharge, notify directly, or indirectly through the carrier, the U.S.

Chapter I—Research and Special Programs Administration

§ 171.20

Coast Guard National Response Center at (toll free) 800-424-8802, or (toll call) 202-426-2675, and furnish the official to whom the discharge notification is made—

(1) The information required by § 171.15.

(2) The name of the shipper of the hazardous substance, and

(3) The quantity of the hazardous substance discharged, if known.

(b) If the person in charge of the aircraft, vessel, transport, vehicle or facility is incapacitated or otherwise unable to make the notification required by this section, the carrier shall make the notification.

(c) An estimate of the quantity of the hazardous substance removed from the scene and the manner of disposition of any unremoved hazardous substance shall be entered in Part H of the report required by § 171.16 of this part.

(Amdt. 171-53, 45 FR 34587, May 22, 1980, as amended by Amdt. 171-53, 45 FR 74648, Nov. 10, 1980)

§ 171.18 Continuation of effectiveness of existing Bureau of Explosives registrations.

A registration filed with the Bureau of Explosives in compliance with a requirement of the subchapter, which is valid at the time that registration function is assumed by MTB remains valid to the same extent as if it had been filed originally with MTB.

(49 U.S.C. 1803, 1804, 1808, 49 CFR 1.53 and App. A to Part I)

(Amdt. 171-50, 44 FR 55577, Sept. 27, 1979)

§ 171.19 Approvals or authorizations issued by the Bureau of Explosives.

Unless otherwise specifically restricted by other requirements of this subchapter, any written approval or authorization issued by the Bureau of Explosives that is valid at the time the Bureau of Explosives authority to issue that approval or authorization is withdrawn or assumed by the Associate Director for HMR and which is available for inspection by representatives of the Department of Transportation, will be considered as having the same validity as if issued by the Associate Director for HMR, and remains

valid under the conditions and for the period established by the Bureau of Explosives.

(49 U.S.C. 1803, 1804, 1808, and 1809, 49 CFR 1.53, App. A to Part I)

(Amdt. 171-70, 48 FR 2655, Jan. 20, 1983)

§ 171.20 Submission of Examination Reports.

(a) When it is required in this subchapter that the issuance of an approval by the Associate Director for HMR be based on an examination by the Bureau of Explosives (or any other test facility recognized by MTB), it is the responsibility of the applicant to submit the results of the examination to the Associate Director for HMR.

(b) Applications for approval submitted under paragraph (a) of this section, must be submitted to the Associate Director for Hazardous Materials Regulation, Materials Transportation Bureau, Washington, D.C. 20590.

(c) Any applicant for an approval aggrieved by an action taken by the Associate Director for HMR, under this subpart may file an appeal with the Director, MTB within 30 days of service of notification of a denial.

(Amdt. 171-54, 45 FR 32692, May 19, 1980, as amended by Amdt. 171-66, 47 FR 43064, Sept. 30, 1982)

PART 172—HAZARDOUS MATERIALS TABLES AND HAZARDOUS MATERIALS COMMUNICATIONS REGULATIONS

Subpart A—General

Sec.

172.1 Purpose and scope.

172.3 Applicability.

Subpart B—Tables of Hazardous Materials, Their Description, Proper Shipping Name, Class, Label, Packaging, and Other Requirements

172.101 Hazardous Materials Table.

172.102 Purpose and use of the Optional Hazardous Materials Table for international shipments.

APPENDIX A—IDENTIFICATION NUMBER CROSS REFERENCE TO PROPER SHIPPING NAMES IN § 172.101 AND § 172.102

5. If the Letter "E" appears with a letter "A" and/or a letter "W", the following applies:
 - a. If the quantity being shipped is less than the Reportable Quantity, the Table applies only if the material is being transported by air or water, whatever the case may be.
 - b. If the quantity being shipped is equal to or greater than the Reportable Quantity, the Table applies regardless of transportation mode.

COLUMN (2) - Hazardous Materials Descriptions and Proper Shipping Names.

1. Shipping names can be used in either singular or plural form.

Example: Flammable Liquid, N.O.S. or Flammable Liquids, N.O.S. (see 3. for N.O.S. definition)

2. The shipping name is given in Roman type. The words in italics are not part of the shipping name, but may be used in addition to the shipping name.
3. The terms N.O.I.(not otherwise indexed), N.O.I.B.N. (not otherwise indexed by name), and N.O.S. (not otherwise specified) are interchangeable. Although the table uses N.O.S., the other designations are also acceptable.
4. The word order as given in the table is preferred.

Example: Flammable Liquid, Poisonous is preferred over Poisonous, Flammable Liquid.
5. When the word "see" is used to refer to a different name, either name is acceptable if both are in Roman type. If only one is in Roman type, it is the name which must be used.
6. The words "poison" or "poisonous" refer to materials that would cause death by systemic poisoning rather than corrosive destruction of tissue.

7. Where a concentration is given as part of the shipping name, the actual concentration can be used.

Example: A 30% hydrogen peroxide solution can be named "Hydrogen Peroxide Solution (8% - 40%)" or "Hydrogen Peroxide Solution, 30% peroxide".

8. The prefix "mono" can be deleted from a chemical name.

Example: Monoethanolamine could also be listed as ethanolamine.

9. Shipping names which have RQ (reportable quantities) numbers listed in parentheses must have the letters RQ included either before or after the shipping name if the quantity figure is exceeded. Where mixtures of materials are being transported, each individual material must undergo the Reportable Quantity evaluation. All materials reported that exceed their RQ limits must be in the shipping name.

10. The word "waste" must precede a shipping name where appropriate.

11. If a mixture contains both hazardous and non-hazardous material, the shipping name would be that of the hazardous material with the word "solution" or "mixture" added, provided the mixture itself is not specifically identified in the Table and the hazard class of the mixture is the same as the hazardous material. No guidance is available as to what % of a non-hazardous material triggers the requirement to include the word "solution" or "mixture".

Example: A mixture of acetone, mineral oil, and water would have a shipping name of "acetone solution".

12. If a shipper does not know exactly what the material is that is being shipped, he should classify it the best he can with the criteria available.
 - a. Defining criteria in this subchapter.
 - b. Use 173.2 to choose its hazard class. (see Section III. C.)
 - c. Shipper's knowledge of material (why it was purchased, etc.)

COLUMN (3) - Hazard Class

1. This column states the hazard class of the material.
2. If the word "Forbidden" is entered, special instructions need to be followed (not presented here).
3. See the "Definitions" section for the criteria for each of the hazard classes (Section II).
4. If the hazard class given in the Table is not correct for some unlikely reason, the correct class should be used.
5. If the material meets the requirements of two hazard classes, the priority as listed in the table in CFR 173.2 should be used (Section III.C.2).

COLUMN (3A) - Identification Number

1. These are the DOT identification numbers which are assigned to the respective materials.

COLUMN (4) - Labels Required (Section III.E)

1. This column indicates what labels are required to be placed on the package for the respective materials. Multiple labels may be required.
2. Labels are diamond-shaped (◊), and relay general safety-related information about the material which would be useful in an emergency.
3. From a DOT-perspective, "labels" include only these diamond-shaped safety-related attachments. All other information items attached to a package or drum are called "markings".
4. Labels must be at least 4" inches on a side, diamond shaped, plus meet rather rigid specifications for each hazard class designation. It is recommended that labels be purchased from vendors such as Labelmaster, Inc. in Chicago. Label specifications are given in 172.407 (Section III.E).

COLUMN (5) - Packaging (Section III.F)

1. This column designates the required packaging for the hazardous material.
2. All packages less than 110 gallons must be marked for their content as required.
 - a. The EPA hazardous waste marking as shown in Appendix F contains almost all the information required for a hazardous waste shipment (see b-c for additional markings required).
 - (1) Proper D.O.T. shipping name if the EPA hazardous waste marking is used. (The word "waste" which is required on the manifest can be dropped on the marking if the EPA Marking is being used.)
 - (2) Identification number.
 - (3) Name and address of generator.
 - (4) EPA identification number.
 - (5) EPA waste number.
 - (6) Manifest document number.
 - (7) Accumulation start date (this is not required for transportation, but is only a convenience made for firms that need to mark this date to fulfill other RCRA requirements).
 - b. When liquid hazardous materials are being shipped, each package must be packed with the closures upward, and the markings "THIS SIDE UP" or "THIS END UP" as appropriate.
 - c. Any material classed as an ORM-A,B,C,D, or E must be marked with the appropriate ORM designation immediately following or below the proper shipping name. Hazardous waste that does not get classified under at least one of the conventional hazard classes (Flammable Liquid, Corrosive Material, etc.) is classified as an ORM-E.
3. In the case of drums, they must also be marked to designate that they are of the required construction (Section III.F.4-5).

- a. If the hazardous waste being shipped cannot be placed in the designated container (cannot fit into a closed-top drum), special provision can be made (Section IV.F.1).
- b. For Flammable liquids, 49 CFR 173.118-.119 are generally referred to (Section III.F.4 of this manual). Depending on the flash point, different drum specifications are required (referred to Part 178).
- c. Part 178 specifies the construction for the various drum types. (Section III.F.5)
 - (1) Typically, 17C-17H drums are specified, with these details described in section 178.115-.118 of this part.
 - (2) Where stricter drum construction is required than is specified for a given drum type, it will be given in Part 173.
- d. The drums need to be marked as discussed in the "Marking" subsection relating to each drum specification. These markings should be permanently placed on the bottom of the drum by its manufacturer.
- e. Drums can be reused as provided for in 173.28 (Section III.F.3).
- f. Packaging requirements for non-steel drum containers are given in other sections of 49 CFR 178. These are rather voluminous and are not included in this manual.

HAZARDOUS WASTE SHIPMENTS

1. MATERIAL: Waste 1,1,1 trichloroethane solvent used for degreasing.
2. SHIPPING NAME: Waste 1,1,1 trichloroethane
3. HAZARD CLASS: ORM-A
4. IDENTIFICATION NUMBERS:
 - a. DOT: UN2831
 - b. RCRA: F001 (see discussion below)
5. ¹ DOT AND RCRA MARKING (for package contents):
 - (1) Completed Hazardous Waste Marking (if applicable)
 - (2) "This End Up"
 - (3) ORM-A
6. DOT LABELING: None
7. DOT PACKAGING:
 - a. Drum specifications: No special requirements
(standard requirements only - CFR 173.24)
 - b. DOT marking (for package itself): Marked for the
specification that it is (see drum bottom)
8. DOT PLACARDING: None
9. COMPLETED UNIFORM HAZARDOUS WASTE MANIFEST (ATTACHED)
10. DISCUSSION: 1,1,1 trichloroethane used for cleaning
would be F001

¹ If a preprinted hazardous waste marking is used, the word "waste" does not have to be written on the marking. However, the word "waste" must appear on all manifests, shipping papers, etc.

Both storage areas have concrete bases. The alcohol storage shed (Area 4) is bermed and has a cement catch basin which will yield a spill containment capacity of 500 gallons. The Kemthane storage area 1 is bermed and has a cement catch tank which yields a spill containment capacity of 500 gallons. The slope of the storage area is directed towards the draw, thereby minimizing accumulation of waste material around the bases of the hazardous waste storage drums for area 1. Area 2 drums are stored on pallets in addition to having the floor sloped towards one draw. Both draws lead to catch tanks as described above.

Liquids accumulating in each of the storage containment areas or the catch tanks will be properly classified as hazardous or non-hazardous waste (per 40 CFR 261) and pumped into appropriate containers and disposed of according to procedures described in this plan. When necessary, rags may be used to clean the storage area floor. The rags would then be disposed of as a hazardous waste if appropriate.

During non-operation hours mill security personnel make hourly tours of the area.

Refer to Figures 5b, 5c, 5d and 5e, for secondary containment descriptions and aisle space configurations. The bases are free of cracks or gaps and are impervious to the wastes being stored. Inspection of structural integrity of base (secondary containment system) has been added to inspection log.

E. Groundwater
Monitoring Systems

E. GROUND WATER MONITORING SYSTEMS

The requirements for ground water monitoring are not applicable to a storage facility such as Development Facility North.

F. SECURITY

1. Procedures and Equipment

Please see Sections B.2 and B.4.

Warning Signs

Signs which are legible from a distance of 25 feet are posted at all fence gates and several other fence locations around the active portion of the facility; these signs are visible from all angles of approach, and bear the legend "Danger - Unauthorized Personnel Keep Out". Also, "No Smoking" signs which are legible for a distance of 25 feet have been placed in the container storage areas.

2. Inspection Schedule

- a. The facility is inspected weekly by the Process Engineer to make sure of the following:

<u>AREA/EQUIPMENT</u>	<u>SPECIFIC ITEM</u>	<u>TYPES OF PROBLEMS</u>	<u>FREQUENCY INSPECTION</u>
Safety And Emergency	Standard industrial (Sorb-All, Vermiculite, etc. 55-gallon drums (steel, stainless steel)	Out of Stock	Monthly/As Needed
	Extra protective eyeglasses	Corrosion, structural damage	Weekly
	Fire blankets	Broken or dirty equipment	Monthly
	Fire extinguishers	Dispensing	As Used
		Needs recharging	Monthly/After Each Use
	Fire alarm system	Power failure	Per NFPA
	Telephone system	Power failure	Per NFPA
	Public address (PA) system	Power failure, speakers	Per NFPA
	Emergency lighting system	Battery failure, lights	Per NFPA
	First aid equipment and supplies	Items out of stock	As Used
	Protective clothing (gloves and foot coverings)	inoperative	
		Holes, normal wear and tear	As Used
Security Devices	Facility fence	Corrosion, damage to chain-link fence or barbed wire	Weekly
	Container storage area fence	Corrosion, damage to chain-link fence or barbed wire	Weekly
	Container storage area gate and lock	Corrosion, damage to chain-link fence or barbed wire, sticking or corroding lock	Weekly
	Two-way radios	Transmitter or receiver	Upon Failure
Operating and Structural Equip- ment	Dikes	Cracks, deterioration	Weekly
	Bases or foundations	Erosion; uneven settlement; cracks and spalling in concrete pads, base rings and piers, deterioration of water seal between tank bottom and foundation, wet spots	Weekly
	Ramps	Erosion, uneven settlement; cracks and spalling in concrete	Weekly

<u>AREA/EQUIPMENT</u>	<u>SPECIFIC ITEM</u>	<u>TYPES OF PROBLEMS</u>	<u>FREQUENCY OF INSPECTION</u>
Container Storage	Container placement and stacking	Aisle space, height of stacks	Weekly
	Sealing of containers	Open lids	Weekly
	Labeling of containers	Improper identification date missing	Weekly
	Containers	Corrosion, leakage, structural defects	Weekly
	Pallets	Damaged (e.g., broken wood wrapping, nails missing)	Weekly
	Fence, gate & lock	Corrosion, damage to chain-link fence, sticking or corroding lock	Weekly
	Base or foundation	Cracks, spalling, uneven settlement, erosion, wet spots	Weekly
	Dikes	Cracks, deterioration	Weekly
	Debris & Refuse	Aesthetics, Weekly possible reaction with leaks	Weekly
	Warning signs	Damaged	Weekly

TIME: _____ INSPECTOR'S NAME: _____

SAFETY AND EMERGENCY EQUIPMENT, SECURITY DEVICES AND STRUCTURAL EQUIPMENT INSPECTED

ITEM	OBSERVATIONS	
	OK	NEEDS ATTENTION
AREA 1		
House Keeping, Orderliness		
Drum Inventory Reconciliation		
Drum Marking, Labeling		
Drum Leaking		
Exhaust Fans Operational		
Warning Signs In Place		
Excessive Odor		
Normal Temperature		
Emergency Lighting Operational		
#90 Bay 4 Comp. RM E 10# CO2 Ext.		
Protective Gloves, Goggles		
Absorbent Material		
Catch Tank Empty		
Adequate Aisle Space *		
Alarm System Operational		
Structural Integrity of Base		

* Sufficient aisle space is maintained to allow the movement of personnel, fire protection equipment, or spill control equipment during an emergency.

ITEM	OBSERVATIONS		REPAIRS
	OK	NEEDS ATTENTION	
AREA 4			
House Keeping, Orderliness			
Drum Inventory Reconciliation			
Drum Marking, Labeling			
Drum Leaking			
Exhaust Fans Operational			
Warning Signs in Place			
Excessive Odor			
Normal Temperature			
Lighting Operational			
#114 Dry A30E 30# Ext.			
Protective Gloves, Goggles			
Absorbent Material			
Catch Tank Empty			
Adequate Aisle Space*			
Security Lock in Place			
Helper Present for Safety			
Structural Integrity of Base			

* Sufficient aisle space is maintained to allow the movement of personnel, fire protection equipment, or spill control equipment during an emergency.

b. Remedial Action

If inspections reveal that non-emergency maintenance is needed, they will be completed as soon as possible to preclude further damage and reduce the need for emergency repairs. If a hazard is imminent or has already occurred during the course of an inspection or any time between inspections, remedial action will be taken immediately. Development Facility North personnel will notify the appropriate authorities per the Contingency Plan (see Section G) and initiate remedial actions. In the event of an emergency involving the release of hazardous constituents to the environment, efforts will be directed towards containing the hazard, removing it, and subsequently decontaminating the affected area. Refer to the Contingency Plan for further details.

c. Inspection Log

An inspection log is maintained for each calendar year in a three-ring binder. After an inspection, each log sheet is filled in the binder, which provides a case history of any item. The inspection log notebook is always kept with the inspection schedule in the Process Engineer's office. As required, records of inspection are kept for at least three years from the date of inspection.

3. Waiver of Preparedness and Prevention Requirements

The applicant does not wish to request a waiver of the preparedness and prevention requirements under 40 CFR 264 Subpart C. Requirements of this Subpart are primarily addressed in Section D, Section F, and Section G of this application.

a. Equipment Requirements

Internal and external communications, emergency equipment, and fire control equipment are discussed in Section F and Section G.

b. Aisle Space Requirements

Adequate aisle space will be available to allow easy access to all drums.

4. Preventative Procedures, Structure, and Equipment

a. See Section D (Process Information) (2) Container Management Practices.

b. No spills are allowed to accumulate. They are handled promptly under Contingency Plan. See Section G. (Contingency Plan) (12) Emergency Procedures.

- c. Equipment power failures would not affect our operation.
- d. Personnel Protection Equipment (safety glasses, boots and gloves) is available as needed from the Small Stores Supervisor.

5. Ignitable Waste Handling

The storage areas are located 50 feet from the property line as shown in figure 4.

Signs are posted warning "No Smoking" and are strictly enforced.

There are no sources of ignition near the hazardous waste storage areas. All wastes stored are compatible with each other.

6. Emergency Equipment Accessibility

The following item is inspected during the weekly inspections of hazardous waste storage areas:

- a. Sufficient aisle space is maintained to allow the unobstructed movement of personnel, fire protection equipment, or spill control equipment during an emergency.

G. Contingency Plan,
Preparedness & Prev.

G. CONTINGENCY PLAN

G. CONTINGENCY PLAN

HAZARDOUS WASTE
SPILL PREVENTION CONTROL 7 COUNTERMEASURE PLAN

1. Name and address of operator:

Name Kimberly-Clark Corporation
 Development Facility North
Address 1111 South Henry Street
 Neenah, Wisconsin 54956

2. Type of facility: Generator and Storage

3. Potential Spills - Prediction and Control:

Description of Wastes

<u>Chemical Names</u>	<u>Trade Names</u>	<u>Major Type of Failure</u>	<u>Total Quantity</u>	<u>Hazardous Waste EPA Numbers</u>	<u>Direction of Flow</u>	<u>Secondary Contain- ment</u>
A. Diethyl benzene	Dowtherm J	Drum rup- ture or spill	55 gallon units	DO01	To floor drains	Concrete catch tank of 500 gallon capacity
B. 1,1,1 Trichloro- ethane	Kemthane	Drum rup- ture or spill	55 gallon units	FO01	To floor drains	Concrete catch tank of 500 gallon capacity
C. Methanol	Methanol	Drum rep- ture or spill	55 gallon units	DO01	To floor drains	Concrete catch tank of 500 gallon capacity
D. Isopropyl Alcohol, Mineral Spirits (Flammable Liquid NOS)	Isopropyl Alcohol, Paint Thinner	Drum rep- ture or spill	55 gallon units	DO01	To floor drains	Concrete catch tank of 500 gallon capacity

4. Method of Storage

- a. Describe barrels used for storage: Reuse original shipment containers for waste storage.
- b. Describe secondary containment design, construction materials, and volume: Dowtherm J leaks would drain to a portland cement tank of 500 gallon capacity. Methanol leaks would drain to a portland cement tank of 500 gallon capacity.
- c. Describe barrel inspection methods, procedures, and recordkeeping: Drums are inspected visually for leaks on a weekly basis. **
Records are kept in the Process Engineer's office.
- d. Describe procedure for filling and emptying barrels: Small containers funneled into 55 gallon barrels. Barrels are emptied with a hand pump.
- e. How is spill prevention and control accomplished when filling or emptying barrels? Personnel are instructed on spill prevention *** and location of sorbent materials.
- f. Describe spill prevention and control measures for wastes contained in barrels: See item 2.
- g. Before any emergency equipment is placed in the facility for potential use, it is properly tested for readiness. Also routine inspections of these items are conducted and records maintained.

** All work done in area 4 (Flammable storage shed) is by 2 or more people at all times.

*** Weekly inspection log attached.

5. Facility Drainage

- a. Drainage from diked storage areas is controlled as follows (include operating description of valves, pumps, ejectors, etc.

Area 1 (Kemthane) drainage is accomplished via a drain to a portland cement tank of 500 gallons.

Area 4 (Methanol) drainage is accomplished via a drain to a portland cement tank of 500 gallons. Waste collected in these catch tanks is hand pumped to 55 gallon drums under the supervision of the Process Engineer.

- b. Drainage from undiked areas is controlled as follows (include description of ponds, lagoon or catchment basins and methods of retaining and returning waste to facility): N/A.
- c. The procedure for supervising the drainage of rain water from secondary containment into a storm drain or an open watercourse is as follows (include description of (a) inspection for pollutants, and (b) method of valving security).

Should water run-off enter the catch tanks, the Process Engineer will determine whether there are hazardous chemicals present.

The determination will be based on presence of odor (Dowtherm J, Kemthane and Methanol have very distinctive odors which are readily detectable) and/or presence of a sheen (Dowtherm J has characteristics like oil and will float).

If no odor and/or sheen is present, the water will be pumped to the sanitary sewer. If an odor and/or sheen is present "A" above applies.

Since I have been RCRA coordinator, no rainwater has been pumped out of the catch tanks. If there is a need in the future, this material will be analyzed by GC/MS to determine its RCRA hazardous waste classification.

6. Written Commitment of Manpower, Equipment, and Materials.

This facility will commit manpower, equipment and materials necessary to clean up any hazardous waste spills and for proper disposal of hazardous waste material.

7.*Emergency Response Contacts

Contacts	Plan Submittal	
	Date	Arrangements
Fire Department	1/25/85	<ul style="list-style-type: none"> - This department has primary emergency authority - Information will be supplied by the emergency coordinator - The emergency coordinator will be advised of actions taken
Police Department	1/25/85	- This department will work with the Fire Department and Facility Coordinator
Theda Clark Hospital	1/25/85	- This department will work with the Fire Department and Facility Coordinator

8. Emergency Coordinators

Name (in order of responsibility)	Address	Telephone	
		Home	Business
A. E. Masak, Jr.	1016 E. Park Ridge Ave., App.	731-7800	721-2937
B. John C. Eckert	1523 S. Lee St., Appleton	731-0308	721-2862
C. Robert Bodges	1023 Surrey Ct., Neenah	725-0348	721-2931

9. Emergency Equipment

Description	Location	Capability
See attached fire plan for fire extinguishers.		
Fire alarm	Entire plant	Audible signal
Automatic sprinkler system	Overhead in entire plant	Unlimited city water
Cal-Flor-Dry	Small Stores	300%

- * Call Division of Emergency Government
- Neenah, Wisconsin - 414-725-6321
- Madison, Wisconsin - 608-266-3232

10. Facility Evacuation Plan

A. Signal:

- Automatic fire alarm
- If any fire is not immediately extinguished by a fire extinguisher, the Neenah fire department will be summoned.

B. Evacuation Routes:
(and alternates)

All exits posted, all people exit to street side of mill parking lot area on west-north side.

C. Method of Communicating Plan to Employees:

Posted safety and new employee indoctrination.

D. Dates of Communication of Applicable:

Done on an individual basis:

New hires are indoctrinated when employment begins and all employees are refreshed during scheduled fire drills.

Items 9 and 10 are covered in the Operations Superintendent's files. Relevant items are communicated to all employees.

11. Emergency Coordinator Responsibilities

All emergency coordinators will read this plan and sign their names and titles at the conclusion indicating understanding this plan.

- A. At all times at least one employee is either at the facility or on call with the responsibility for coordinating all emergency response measures.
- B. All emergency coordinators are thoroughly familiar with:
 - 1. All aspects of the facility's contingency plan.
 - 2. All operations and activities at the facility.
 - 3. The location and characteristics of waste handled.
 - 4. The location of all records within the facility.
 - 5. The facility layout.
- C. The emergency coordinator has the authority to commit the resources needed to carry out the contingency plan.

12. Emergency Procedures

**

- A. Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) immediately:
 - 1. Activates internal facility alarms or communications systems which will notify ALL personnel.
 - 2.* Notifies appropriate state or local agencies with designated response roles if their help is needed.
- B. Whenever an emergency situation would occur, the emergency coordinator will immediately identify the character exact source, amount and a real extent of any released materials.
- C. The emergency coordinator is able to assess possible hazards to human health and the environment that an emergency situation might cause.

- * Call Division of Emergency Government:
 - Neenah, Wisconsin - 414-725-6321
 - Madison, Wisconsin - 608-266-3232

- ** Emergency situation is defined as a spill outside the designated generation, transportation and storage areas (see map on page 10a1), a fire or a situation where employee health or safety may be endangered.

- D. The emergency coordinator reports an emergency situation which could threaten human health or the environment as follows:
 - 1. He immediately notifies local authorities to evacuate local area, if necessary.
 - 2. He immediately notifies either the government official designated as the on-scene coordinator for that area or the National Response Center. He will be knowledgeable to report:
 - a. Name and telephone number of reporter.
 - b. Name and address of facility.
 - c. Time and type of incident.
 - d. Name and quantity of materials involved, to the extent known.
 - e. The extent of injuries
 - f. The possible hazards to human health, or the environment, outside the facility.
- E. The emergency coordinator will take all reasonable measures to ensure that fires, explosions and releases do not occur, recur, or spread to other parts of the facility once an initial incident has occurred.
- F. The emergency coordinator will use the necessary equipment and manpower to monitor for leaks, pressure buildup, gas generation or equipment ruptures, where these occurrences are possible.
- G. The emergency coordinator will provide facilities for treating, storing or disposing of resultant waste material that could result from an emergency occurrence.

- H. The emergency coordinator is adequately trained to ensure that, in the affected area(s) of the facility:
1. No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are complete.
 2. All emergency equipment used in the contingency plan is cleaned and fit for its intended use before operations are resumed.
- I. The Regional Administrator, and appropriate state and local authorities, will be notified that the facility is in compliance with items listed in H. above, before resuming operation in the affected area(s) of an emergency.
- J. The facility will report to one Regional Administrator, the following information within 15 days of an emergency incident and a copy will be retained in appendix IV B.
1. Name, address and telephone number of the owner or reporter.
 2. Name, address and telephone number of the facility.
 3. Date, time, and type of incident.
 4. Name and quantity of material involved.
 5. The extent of injuries.
 6. An assessment of actual or potential hazards to human health or the environment.
 7. Estimated quantity and disposition of recovered material that resulted from the incident.
- K. Signatures of emergency coordinators.
- Robert Hodges - Operations Manager Robert Hodges
- Edward Masak - Mill Manager Edward Masak
- John Eckert - Process Engineer John Eckert

-19j-

On the following pages (19j1 through 19j3)
is found the Waste Handling Activity for
each type of hazardous waste generated
and stored at the Facility.

13. Waste Handling Activity (for each type of material)

- A. Material name Dowtherm J
- B. Job positions which are involved in the handling of this material are listed below. Copies of the job descriptions are given in the Job Descriptions section.
1. Maintenance Service Operator Oiler
 2. Process Engineer
 3. Dispatcher Receiver
 4. Warehouse Materials Coordinator

C. The normal handling procedures for this material are listed below:

<u>Emergency Situation</u>	<u>Procedures</u>	<u>Responsible Position (see B)</u>
Spill	1. Contain spill	Anyone
	2. Notify Emergency Coordinator	Anyone
	3. Initiate contingency plan	Emergency Coordinator
Fire	1. Follow fire procedure	Anyone

13. Waste Handling Activity (for each type of material)

A. Material name Methanol and Flammable liquid nos.

B. Job positions which are involved in the handling of this material are listed below. Copies of the job descriptions are given in the Job Descriptions section.

1. Lab Supervisor
2. Process Engineer
3. Head Dispatcher/Receiver
4. Warehouse Materials Coordinator

C. The normal handling procedures for this material are listed below:

<u>Procedures</u>	<u>Responsible Position</u> <u>(see B)</u>
Places used Methanol into storage container in waste storage area.	Lab Supervisor
Samples material for analysis	Process Engineer
Removes containers from storage to shipment vehicle under Process Engineer's direction.	Head Dispatcher/Receiver or * Warehouse Coordinator

D. Possible emergency situations involving the activity are described below with required action by the responsible personnel:

<u>Emergency Situation</u>	<u>Procedures</u>	<u>Responsible Person</u>
Spill	1. Contain spill	Anyone
	2. Notify coordinator	Anyone
	3. Initiate contingency plan	Coordinator
Fire	Follow fire procedure	Anyone

* For Area 4, two people are required in area for all work in storage area (flammable storage shed).

13. Waste Handling Activity (for each type of material)

A. Material name Kemthane, (1,1,1 Tri-chloroethane)

B. Job positions which are involved in the handling of this material are listed below. Copies of the job descriptions are given in the Job Descriptions section.

1. Maintenance Service Operator Oiler
2. Process Engineer
3. Dispatcher Receiver
4. Warehouse Materials Coordinator

C. The normal handling procedures for this material are listed below:

Procedures	Responsible Position (see B)
Transports full collection container to storage area.	Oiler
Samples material for analysis.	Mill Process Engineer
Removes container from storage to shipment vehicle under Mill Process Engineer's direction	Head Dispatcher/Receiver or Warehouse Materials Coordinator

D. Possible emergency situations involving the activity are described below with required action by the responsible personnel:

Emergency Situation	Procedures	Responsible Person
Spill	1. Contain spill	Anyone
	2. Notify coordinator	Anyone
	3. Initiate contingency plan.	Coordinator
Fire	Follow fire procedure	Anyone

REFERENCE SHEET FOR
EMERGENCY ARRANGEMENTS

Date: 12/18/80

Mill Contact: J. C. Eckert

Type of Hazardous Waste Facility: Generator-Storage

Facility Layout: See maps in Part 1, Part 3 of application

Evacuation routes not necessary as mill complex is small, see
19f for procedure.

Other Department Contacted:

Fire Department*
Police Department
Theda Clark Hospital

HAZARDOUS WASTES HANDLED

<u>Wastes</u>				Type of Illness or Injuries Incurred by Contact
EPA Hazardous Waste	Chemical Name	Trade Name	Important Characteristics and/or Properties	
D001	Diethyl benzene Isopropyl alcohol Aliphatic hydro- carbons Methanol Mineral spirits	Waste heat transfer agent Waste solvents	ignitable	burns
F001	1,1,1 trichloroethane	Degreaser	toxic	asphyxiation

*The department with primary responsibility is noted.

14. Amendment of Contingency Plan this plan will be revised when:

- A. Applicable regulations were revised. _____
- B. The plan failed in an emergency. _____
- C. The facility changed in some manner to necessitate a change in the plan. _____
- D. The list of emergency coordinators changed. _____
- E. The list of emergency equipment changed. _____

15. Copies of Contingency Plan

- A. A copy of the contingency plan is maintained at the facility at these locations.
 - 1. Process Engineer Office
 - 2. Operations Superintendent's Office
- B. Organizations outside this facility which have a copy of the contingency plan are:
 - 1. Fire Department
 - 2. Police Department
 - 3. Theda-Clark Hospital
 - 4. Emergency Government Director Winnebago County Courthouse
- C. Revisions are sent to the above locations when necessary.

Date of Revisions:	<u>11/20/81</u>	Removed Pentanol added Methanol
	<u>2/1/84</u>	Replace Lang with Eckert
	<u>1/22/85</u>	Simplified Emergency Coordinator Notification
	<u>3/6/85</u>	Added 2 person work requirement in Area 4
	<u>4/22/85</u>	Rearranged pages, page numbers only.
	<u>1/ 1/86</u>	Closed areas 2,3.

16. SPOC Plan, Attachment #1 Spill History

(Complete this form for any reportable spill(s) which has (have) occurred from this facility.

No spills as of 4/22/85

Date:

Volume:

Cause:

Corrective action taken:

Plans for preventing recurrence:

IV. PREPAREDNESS AND PREVENTION (SUBPART C)

A. Required Equipment

This facility is equipped with the following unless none of the hazards posed by the wastes could require a particular kind of equipment.

1. An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to all facility personnel. Describe:

Automatic fire alarm system and verbal.

2. A device such as a telephone or two-way radio capable of summoning assistance (external). Describe:

Yes. A telephone is located approximately 150 feet from any storage area in this facility.

3. Fire control equipment, spill control equipment and decontamination equipment (on-site). Describe:

Sprinkler system, portable fire fighting equipment, all of which is adequately marked. For details see 19n1 through 19n8.

4. Water at adequate volume and pressure to supply water hose streams, or foam producing equipment or automatic sprinklers or water spray systems. Describe system:

Sprinkler system inspected with facility personnel and Factory Mutual Insurance records available in mill office.

B. Testing and Maintenance of Equipment

All facility equipment named above is tested and maintained as required to perform correctly. (See Inspection Requirements section - F.2) Maintained in Engineering files.

C. Access to Communications or Alarm Systems

1. Whenever hazardous waste is being poured, mixed, spread or handled, all personnel have immediate access to equipment mentioned above in A.1. unless the nature of the waste does not warrant it.
2. If there is ever just one employee on the premises during operation, he has immediate access to the equipment listed above in A.2. unless the nature of the waste does not warrant it. Two people will always be present when working in area 4.

Items in C above are enforced.

FIRE ALARM PROCEDURE

1. The Shiftleader will call the fire department as soon as the alarm is sounded. Under no circumstances will the fire department be called off.
2. Shiftleader designates and trains a valve man.
3. Converting Machine Tender makes sure the gates are unlocked and directs the fire department to the fire.
4. All remaining Machine Tenders will report to the Shiftleader for fire fighting duties. The Shiftleader will supervise the fire fighting in the Fire Chief's absence.
5. One material handler will report to the Shiftleader for phone support on all shifts.

When the alarm is sounded the following people will evacuate the building except if a member of the fire brigade:

All maintenance personnel.

All warehouse personnel.

All office personnel except receptionist who will remain near her phone for further communications with police, fire department, T.C.C. security guard.

All Bay 5 - Sheeter people

Bay 1 and Bay 2 will shut down and evacuate.

All other Bays will continue to operate unless fire is in your area; then shut the machine down and evacuate.

Follow up:

Call Fire Chief, Assistant or Jim Rymer to report the incident.

1. Make sure pull box is reset.
 2. Kimtech main control board is reset.
 3. All spent extinguishers are recharged and replaced.
- Valley Fire Protection 24 hour number - 731-1344
 - On B & C Shift and weekend, T.C.C. is to be called to supply information - Extension 2156.

EMERGENCY EQUIPMENT

In the event of a fire, the Development Facility has an overhead water sprinkler system which is connected to the city water supply and which is automatically triggered by temperature sensing devices at each sprinkler shower head.

The Development Facility has an audible fire alarm system which is manually activated by pulling a fire alarm switch or automatically activated by a pressure drop in the overhead sprinkler system. The Neenah Fire Department automatically responds to these alarms.

There are 113 fire extinguishers located throughout the Development Facility. See attached listing for location and capability of each.

WASTE KEMTHANE STORAGE - AREA 1

Emergency protection consists of:

1. An overhead automatic water sprinkler system which is supplied by city water (virtually unlimited supply capacity).
2. A dry chemical fire extinguisher (91) of 30 pound capacity located at the entrance to the area. Also, a carbon dioxide extinguisher (90) of 10 pound capacity located 30 feet from the entrance to the area.
3. Continuous exhaust ventilation of 650 cubic feet per minute at the floor in this area.
4. Leak drainage to a cement catch tank (Crl) of 500 gallon capacity.

ALCOHOL STORAGE SHED - AREA 4

Emergency protection consists of:

1. Barrel grounding for when removing alcohol from 55 gallon drums.
2. Continuous operation ventilation fan for fume exhaust from alcohol storage shed.
3. Explosion proof storage shed.
4. Leak drainage to a cement catch tank (CT3) of 500 gallon capacity.
5. A dry chemical fire extinguisher (114) of 30 pound capacity located in the storage shed.
6. Two people will be present at all times during operations in the storage shed.

FIRE EXTINGUISHER LISTING

<u>NUMBER</u>	<u>LOCATION</u>	<u>TYPE</u>	<u>CAPACITY</u>	<u>EFFECTIVE DISCHARGE TIME</u>
1.	North Warehouse SW corner	Dry A20E	20 lbs.	20 sec.
2.	North Warehouse NW corner	Dry A20E	20 lbs.	20 sec.
3.	North Warehouse NE corner	Dry A20E	20 lbs.	20 sec.
4.	North Warehouse S end	Dry A30E	30 lbs.	25 sec.
5.	Bay 5 NW corner	CO ₂	15 lbs.	22 sec.
6.	Bay 5 W middle	Dry A20E	20 lbs.	20 sec.
7.	Northwest Warehouse E middle	Dry A20E	20 lbs.	20 sec.
8.	Northwest Warehouse N middle	CO ₂	15 lbs.	22 sec.
9.	Northwest Warehouse W	Dry A20E	20 lbs.	20 sec.
10.	Bay 2A SW	Dry A20E	20 lbs.	20 sec.
11.	Bay 2A E	Dry A20E	20 lbs.	20 sec.
12.	Bay 2A W	Dry A20E	20 lbs.	20 sec.
13.	Bay 2A Mezzanine	Dry A20E	20 lbs.	20 sec.
14.	Bay 2A Mezzanine	CO ₂	10 lbs.	22 sec.
15.	Northwest Warehouse center	Dry A20E	20 lbs.	20 sec.
16.	Shop	Dry A20E	20 lbs.	20 sec.
17.	Shop	CO ₂	10 lbs.	22 sec.
18.	Trim room	Dry A10E	10 lbs.	15 sec.
19.	Tractor isle (outside trim room)	CO ₂	10 lbs.	22 sec.
20.	Sheet N	Dry A20E	20 lbs.	20 sec.
21.	Sheeter E	Dry A10E	10 lbs.	15 sec.
22.	Bay 1 NW	Dry A20E	20 lbs.	20 sec.
23.	Bay 1 NW	Dry A20E	20 lbs.	20 sec.

<u>NUMBER</u>	<u>LOCATION</u>	<u>TYPE</u>	<u>CAPACITY</u>	<u>EFFECTIVE DISCHARGE TIME</u>
24.	Bay 1 E	Dry A20E	20 lbs.	20 sec.
25.	Bay 1 E	CO ₂	10 lbs.	22 sec.
26.	Bay 1 S	Dry A30E	30 lbs.	25 sec.
27.	Bay 1 S center	Dry A20E	20 lbs.	20 sec.
28.	Bay 1 S center	Dry A30E	30 lbs.	25 sec.
29.	Bay 1 S center	Dry A10E	10 lbs.	15 sec.
30.	Bay 1 S center	Dry A20E	20 lbs.	20 sec.
31.	Bay 1 S center	Dry A30E	30 lbs.	25 sec.
32.	Bay 1 S center	Dry A20E	20 lbs.	20 sec.
33.	Bay 1 center	CO ₂	10 lbs.	22 sec.
34.	Bay 1 center	CO ₂	10 lbs.	22 sec.
35.	Bay 1 center	CO ₂	10 lbs.	22 sec.
36.	Bay 1 center	CO ₂	10 lbs.	22 sec.
37.	Bay 1 center	CO ₂	15 lbs.	22 sec.
38.	Bay 1 center	CO ₂	20 lbs.	22 sec.
39.	Bay 2 SE	Dry A20E	20 lbs.	20 sec.
40.	Bay 2 Treatment mezzanine	CO ₂	15 lbs.	22 sec.
41.	Bay 2 E	Dry A20E	20 lbs.	20 sec.
42.	Bay 2 S center	Dry A10E	10 lbs.	15 sec.
43.	Bay 2 SW	Dry A20E	20 lbs.	20 sec.
44.	Bay 2 center	Dry A10E	10 lbs.	15 sec.
45.	Bay 2 center	Dry A20E	20 lbs.	20 sec.
46.	Bay 2 N	Dry A20E	20 lbs.	20 sec.
47.	Bay 2 Mezzanine S	Dry A20E	20 lbs.	20 sec.
48.	Bay 2 Mezzanine S	Dry A20E	20 lbs.	20 sec.

<u>NUMBER</u>	<u>LOCATION</u>	<u>TYPE</u>	<u>CAPACITY</u>	<u>EFFECTIVE DISCHARGE TIME</u>
49.	Bay 2 Mezzanine W	Dry A20E	20 lbs.	20 sec.
50.	Bay 2 Mezzanine NW	Dry A20E	20 lbs.	20 sec.
51.	Bay 2 Mezzanine N	Dry A20E	20 lbs.	20 sec.
52.	Bay 5 Mezzanine over trim room	Dry A20E	20 lbs.	20 sec.
53.	Bay 3 N	Dry A30E	30 lbs.	25 sec.
54.	Bay 3 NE	Dry A20E	20 lbs.	20 sec.
55.	Bay 3 NE	CO ₂	10 lbs.	22 sec.
56.	Bay 3 E	Dry A30E	30 lbs.	25 sec.
57.	Bay 3 E	Dry A30E	30 lbs.	25 sec.
58.	Bay 3 Mezzanine E	Dry A20E	20 lbs.	20 sec.
59.	Bay 3 Mezzanine N	Dry A30E	30 lbs.	25 sec.
60.	Bay 3 Mezzanine N	Dry A20E	20 lbs.	20 sec.
61.	Bay 3 Mezzanine S	Dry A30E	30 lbs.	25 sec.
62.	Bay 3 SE	CO ₂	10 lbs.	22 sec.
63.	Bay 6 NE	Dry A30E	30 lbs.	25 sec.
64.	Bay 6 E	CO ₂	15 lbs.	22 sec.
65.	Bay 6 SE	Dry A20E	20 lbs.	20 sec.
66.	Bay 6 SE	CO ₂	10 lbs.	22 sec.
67.	Bay 6 SW	Dry A20E	20 lbs.	20 sec.
68.	Bay 6 SW	Dry A30E	30 lbs.	25 sec.
69.	Bay 6 N	CO ₂	10 lbs.	22 sec.
70.	Bay 6 N	CO ₂	15 lbs.	22 sec.
71.	Bay 6 N	CO ₂	10 lbs.	22 sec.
72.	Bay 6 N	CO ₂	10 lbs.	22 sec.

<u>NUMBER</u>	<u>LOCATION</u>	<u>TYPE</u>	<u>CAPACITY</u>	<u>EFFECTIVE DISCHARGE TIME</u>
73.	Bay 6 NW	Dry A20E	20 lbs.	20 sec.
74.	Bay 6 Mezzanine NE	Dry A20E	20 lbs.	20 sec.
75.	Bay 6 Mezzanine E	Dry A10E	10 lbs.	15 sec.
76.	Bay 6 Mezzanine E	CO ₂	10 lbs.	22 sec.
77.	Bay 6 Mezzanine NW	Dry A20E	20 lbs.	20 sec.
78.	Bay 6 Mezzanine NW	CO ₂	10 lbs.	22 sec.
79.	Bay 6 Mezzanine SW	Dry A20E	20 lbs.	20 sec.
80.	Bay 6 Mezzanine SW	CO ₂	20 lbs.	22 sec.
81.	Bay 6 Tower SW	Dry A20E	20 lbs.	20 sec.
82.	Bay 6 Tower N	Dry A30E	30 lbs.	25 sec.
83.	Bay 4 1st Floor SE	Dry A30E	30 lbs.	25 sec.
84.	Bay 4 1st Floor SW	CO ₂	19 lbs.	22 sec.
85.	Bay 4 1st Floor W	Dry A20E	20 lbs.	20 sec.
86.	Bay 4 1st Floor NW	Dry A20E	20 lbs.	20 sec.
87.	Bay 4 1st Floor NW	Dry A30E	30 lbs.	25 sec.
88.	Bay 4 1st Floor N	Dry A20E	20 lbs.	20 sec.
89.	Bay 4 1st Floor E	Dry A20E	20 lbs.	20 sec.
90.	Bay 4 Compressor Room E	CO ₂	10 lbs.	22 sec.
91.*	Bay 4 A1	Dry A30E	30 lbs.	25 sec.
92.	Bay 4 5th Floor	Dry A30E	30 lbs.	25 sec.
93.	Bay 4 5th Floor	Dry A20E	20 lbs.	20 sec.
94.	Bay 4 5th Floor	CO ₂	10 lbs.	22 sec.
95.	Bay 4 5th Floor	CO ₂	10 lbs.	22 sec.
96.	Bay 4 4th Floor	Dry A20E	20 lbs.	20 sec.

<u>NUMBER</u>	<u>LOCATION</u>	<u>TYPE</u>	<u>CAPACITY</u>	<u>EFFECTIVE DISCHARGE TIME</u>
97.	Bay 4 4th Floor	Dry A20E	20 lbs.	20 sec.
98.	Bay 4 4th Floor	Dry A30E	30 lbs.	25 sec.
99.	Bay 4 3rd Floor	Dry A20E	20 lbs.	20 sec.
100.	Bay 4 3rd Floor	Dry A30E	30 lbs.	25 sec.
101.	Bay 4 2nd Floor	CO ₂	10 lbs.	22 sec.
102.	Bay 4 2nd Floor	CO ₂	10 lbs.	22 sec.
103.	Bay 4 2nd Floor	CO ₂	10 lbs.	22 sec.
104.	Bay 4 2nd Floor	CO ₂	10 lbs.	22 sec.
105.	Bay 4 Elevator	CO ₂	10 lbs.	22 sec.
106.	Office 1st Floor	CO ₂	10 lbs.	22 sec.
107.	Office 1st Floor	Dry A20E	20 lbs.	20 sec.
108.	Office 1st Floor Lab	Dry A20E	20 lbs.	20 sec.
109.	Office 2nd Floor	Dry A5E	5 lbs.	11 sec.
110.	Office 2nd Floor	Dry A30E	30 lbs.	25 sec.
111.	Office 2nd Floor	Dry A20E	20 lbs.	20 sec.
112.	Office 2nd Floor	CO ₂	10 lbs.	22 sec.
113.	Office 2nd Floor	Dry A5E	5 lbs.	11 sec.
114.*	Alcohol Storage Shed	Dry A30E	30 lbs.	25 sec.

* Hazardous Waste Areas

D. Required Aisle Space

Aisle space is maintained to allow unobstructed movement of personnel and equipment unless such aisle space is not needed for them. This is enforced.

E. Arrangements with Local Authorities

1. The following entities (appropriate to the needs of the facility) have been supplied with the facility layout, properties of hazardous waste, places where facility personnel are normally working and entrances and possible evacuation routes. (Sample attached)

Police Department	<u>1/25/85</u>	Date Notified
Fire Department	<u>1/25/85</u>	Date Notified
State Emergency Response Teams	* _____	Date Notified
Div. of Emergency Government (County)	_____	Date Notified
Emergency Response Contractors	* _____	Date Notified
Equipment Suppliers	* _____	Date Notified AND

2. Local hospitals have been notified of the hazardous waste properties and the types of illnesses or injuries which they could incur.

Theda Clark Hospital	<u>1/25/85</u>	Date Notified
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3. These entities have entered into arrangements with our operation.

* Not applicable for our particular types of wastes.

H.

PERSONNEL TRAINING

Outline of Training Program (Figures 8 and 9) shows the organization of personnel at the Development Facility North regarding hazardous waste activities. Positions which are directly involved with the handling of hazardous waste:

- Process Engineer
- Laboratory Supervisor
- Operations Manager
- Operations Superintendent*
- Dispatcher Receiver
- Warehouse Materials Coordinator
- Maintenance Service Operator - Oiler

*For Resource Conservation and Recovery Act, the Operations Superintendent is considered a "Shift Leader" for Hazardous Waste Facility operations and training.

Figure 8 - Job Title and Duties

Position Title: Process Engineer
Resource Conservation and Recovery Act Duties

Name of Incumbent: John C. Eckert

Position Responsibilities and Duties re: RCRA:

- Emergency Coordinator for all hazardous waste activities.
- Training of plant personnel in the proper handling of raw materials, intermediates, finished products, and waste byproducts.
- Responsible for all air, water, and solid waste control systems on the site.
- Obtains all required permits and licenses or modifications of same from local, state, and Federal regulatory bodies.
- Resolves problems involving permits and licenses from local, state, and Federal regulatory agencies.
- Notifies proper authorities in emergency situation.
- Reports to Mill Manager.
- Regularly inspects plant grounds and all facilities for status of air, water, and solid/hazardous waste emissions and controls.
- Consults with Shift Leader on questions involving emergency action.
- Drafts and submits to mill manager all required reports to EPA or the State.
- Schedules all maintenance and repairs to structures and equipment for HWM facility.
- Responsible for all labeling, marking and placarding for RCRA and DOT Regulations.
- Maintains operating log, monitoring records, maintenance records, inspection records, personnel training records, and all other required records.
- Audits procedures for all hazardous waste facility operations.

Experience and Qualifications:

- B.S. Degree in Chemistry
- Seven years experience in industrial pollution control management.
- Training professional short courses in hazardous chemicals, hazardous chemical waste management in-house seminars. Consultation with in-house Environmental Staff and US-EPA and Wisconsin DNR.

Position Title(s): Operations Superintendent
Shift Leader
Laboratory Supervisor

Name of Employee(s): R. A. Neubauer
D. G. Tanguay
A. E. Schuette
R. J. Vanevenhoven
A. R. Neumann
J. E. Laumer
D. L. Hildebrandt

Position Responsibilities and Duties regarding RCRA:

- Overall operation and maintenance of the hazardous waste storage facility.
- Maintains facility compliance with RCRA and other permits.
- Oversees operators and reviews their performance.
- Trains operators to:
 - Operate materials/drum handling equipment safely and effectively.
 - Handle leaks, spills, and emergency situations.
- Notifies plant environmental engineer, plant manager, and if so directed, proper authorities in emergency situations.
- Reports to Operations Manager (R. W. Hodges, Group A Emergency Contact)
- Interface with Process Engineer regarding all RCRA activities.
- Inspects emergency equipment on a regular basis.
- Ensures that at least two people are present for operations in area 4.

Experience and Qualifications:

- All H. S. Diploma.
- All minimum 5 years experience.
- All proceeding with in-mill training programs regarding RCRA activities. Other pertinent information contained in personnel file.

Position Title: Dispatcher Receiver

Name of Incumbent: P. Bergner
M. Nabbefeldt
D. Smith

Position Responsibilities and Duties regarding RCRA:

- Reports to Shift Leader.
- Reviews all generated wastes and assigns wastes to proper storage location.
- Inspects drum storage area for evidence of leaks and spills and inappropriately placed drums.
- Assists in training of new operators and mechanics to handle hazardous waste spills and leaks safely in such a way as to avoid exposures.
- Notifies Shift Supervisor and other plant authorities as necessary in emergency situations.
- Takes emergency action on own authority in accordance with established procedures.
- Assigns or is present with another person when carrying out duties in area 4.

Experience and Qualifications:

- High School Diploma.

Note: Training in hazardous waste handling procedures is conducted by Development Facility North.

Position Title: Warehouse Materials Coordinator

Name of Incumbent: R. Larsen

Position Responsibilities and Duties regarding RCRA:

- Reports to Shift Leader
- Reviews all generated wastes and assigns wastes to proper storage location.
- Inspects drum storage area for evidence of leaks and spills and inappropriately placed drums.
- Assists in training of new operators and mechanics to handle hazardous waste spills and leaks safely in such a way as to avoid exposures.
- Notifies Shift Supervisor and other plant authorities as necessary in emergency situations.
- Takes emergency action on own authority in accordance with established procedures.
- Assigns or is present with another person when carrying out duties in area 4.

Experience and Qualifications:

- High School Diploma.

Note: Training in hazardous waste handling procedures is conducted by Development Facility North

Position Title: Oiler

Name Of Employee(s): J. Rymer - Supervisor
R. Hartung
R. Gischia
J. Sherry
J. Lindsley
E. Lorenz
M. Pechotta
S. Houg
J. Behling

Alternates for Operations Superintendent
Shiftleader
Warehouse Materials Coordinator
Oiler

D. Franz
J. Banda
J. Allen
D. Fleese
M. Haddock
J. Debroka
C. Hagens
W. Schultz

Position responsibilities and duties regarding RCRA:

- Reports to Shift Leader.
- Fills drums with hazardous waste.
- Inspects drums for leaks, proper bungs.
- Assists in training new operators in proper handling procedures.
- Notifies Shift Leader and other plant authorities as necessary in emergency situations.
- Takes emergency action on own authority in accordance with established procedures.
- Conducts duties in area 4 only with another person present for safety and alarm purposes.

Experience and qualifications:

- See mill personnel records.

TRAINING CONTENT, FREQUENCY AND TECHNIQUE

The training program used at the Development Facility North (DFN) is based on the Kimberly-Clark "Hazardous Wastes Handbook". Provisions are made for updating or revising the text as necessary to ensure compliance with the terms of the RCRA permit. An outline of the Handbook and training levels is shown in Figure 9. The Handbook is kept on file at the Development Facility North and is available to EPA officials for review.

During the training program, employees are instructed on (1) the hazardous nature of chemicals and chemical wastes in general, (2) the purpose of RCRA and importance of maintaining compliance with RCRA regulations, (3) the hazardous nature of the wastes being stored in the facility, (4) proper handling and storage procedures for wastes, (5) Emergency Procedures and Contingency Plan.

The Hazardous Waste Handbook is used as the framework for training DFN personnel in the proper procedures, equipment and systems to be used in managing hazardous wastes.

The training program is designed to teach proper handling procedures for hazardous waste. It also teaches proper response to emergency situations. Training teaches employees that under no circumstances is there to be a deviation from hazardous waste compliance. In conjunction with the DFN Fire Procedures (on file at DFN) the following nonroutine training elements are included:

- Procedures for locating, using, inspecting, repairing, and replacing facility emergency equipment.
- Emergency communication procedures and alarm systems.
- Response to fires or explosions.
- Response to spills, and procedures for containing, controlling and mitigating such spills.
- Shutdown of operations and power failure procedures.

In conjunction with this, the City of Neenah Fire Department is available for response to all fires and other general plant emergencies. The DFN conducts extensive annual fire safety training programs in conjunction with Fire Prevention Week in October and other training sessions throughout the year.

FIGURE 9

OUTLINE OF HAZARDOUS WASTE TRAINING HANDBOOK

TRAINING LEVEL 1

Process Engineer - J. C. Eckert*
Mill Manager - E. Masak, Jr.

Complete Hazardous Wastes Handbook Outline

- I. Introduction
- II. Generator Requirements
 - A. Manifest and Pretransportation Requirements
 - B. Recordkeeping and Reporting
- III. General Facility Standards
 - A. Waste Material Information
 - B. Waste Handling Data
 - C. Security
 - D. Facility Inspection Records
 - E. Records
 - 1. Job Descriptions
 - 2. Training Records
 - F. Ignitable, reactive or incompatible waste
- IV. Preparedness and Prevention
- V. Contingency Plan
- VI. Manifest System Recordkeeping and Reporting
 - A. Mainifest Copies
 - B. Operating Record
 - C. Annual Report
- VII. Closure Plan

* Training Director

VIII. Financial Requirements

IX. Special Cases

- A. Groundwater
- B. Use and Management of Containers
- C. Tanks
- D. Surface Impoundments
- E. Waste Piles
- F. Chemical, Physical and Biological Treatment

X. Notifications

IX. Permit Application

XII. Appendix

- A. Facility Map
- B. RCRA Regulatory Information
- C. DOT Regulatory Information
- D. Samples and Sampling Procedures

FIGURE 9

TRAINING LEVEL 2

Operations Manager - R. Hodges
Operations Superintendent - R. Neubauer
Shiftleader - A. Neumann
Shiftleader - A. Schuette
Shiftleader - D. Tanguay
Shiftleader - R. Vanevenhoven

- I. Introduction
- II. Facility Process Description
- III. Emergency Procedures and Contingency Plan
- IV. Plus Level 3 Items

TRAINING - LEVEL 3

Warehouse Materials Coordinator - R. G. Larsen
Dispatcher/Receiver - P. Bergner
Dispatcher/Receiver - D. Smith
Dispatcher/Receiver - M. Nabbefeldt

- I. Introduction
- II. Specific Waste Handling Instructions
- III. Emergency Procedures

Training Director

The personnel training program is directed by John C. Eckert, a Development Facility North Process Engineer. Mr. Eckert has been with Kimberly-Clark Corporation for 17 years and the Development Facility North for two years in conjunction with his responsibilities at Kimberly-Clark Atlas Mill. He received a B.S. degree in Chemistry in 1966. He has been trained in all aspects of Hazardous Waste Management relating to generating and storage facilities. He has attended various seminars and workshops on the subject. Records of such training are contained in the Development Facility North Hazardous Waste Handbook.

Relevance of Training to Job Position

Mr. John C. Eckert, a Development Facility North Process Engineer, is responsible for teaching Hazardous Waste Management Procedures and Contingency Plan implementation to all waste handling personnel. A tiered training program is used to include material relevant to level of responsibility and duties.

Training for Emergency Response

The director of the training program and all current waste-handling personnel have been fully trained at the time of this submittal. In the future all new personnel will complete this training program within six months of assignment to the hazardous waste storage facility or within six months of their date of employment, whichever is later.

Implementation of Training Program

No untrained employee will work in the hazardous waste facility without direct supervision or without completion of the training program.

Employees are required to meet annually for review and update of this training program. The following is covered at such meetings:

- All hazardous wastes currently being handled at the facility. Changes in waste type, source, volume are noted.
- Status of storage and operating conditions. Potential problems and solutions are discussed with employee participating in developing effective solutions.
- Requirements contained in the facility's RCRA permit.
- Changes in RCRA permit status if applicable.
- Incidents requiring implementation of Contingency Plan and/or emergency actions. Prevention of failure of procedures is the key here.

The Quarterly Reports to the Wisconsin Department of Natural Resources and annual reports to EPA will be used as a working document for the review.

Records documenting the job title for each position, job descriptions, names of employees, and complete training programs will be kept onsite in the Process Engineer's files and mill personnel files. These records will be kept until closure of the facility for current employees and for three years from the date of the individual employee's termination for former employees.

I. CLOSURE PLAN

I. DEVELOPMENT FACILITY NORTH CLOSURE PLAN

ITEM I. Facility Conditions

A. General Conditions

1. Facility consists of two storage areas as shown on page 2e. Both areas have an impervious concrete floor and catch basin.

The flammable storage shed is a 15'x20' metal building equipped with a 4" berm, manual fire alarm, exhaust fan, sealed explosion proof lighting and a portable fire extinguisher (area 1). When not in use the shed is secured with a padlock. (Maximum capacity is 25 drums).

Area 4 consists of a 9' by 12' storage area equipped with a drain to a 500 gallon concrete catch basin. This area is equipped with automatic sprinklers, a portable CO₂ fire extinguisher, and access is via secured facility only. (Maximum capacity is 15 drums).

2. 55 gallon drums are the only storage method used. Wastes stored include:
 - a. Flammable spent solvents; typically mineral spirits, methanol, isopropanol, non-halogenated hydrocarbon degreasers.
 - b. Waste 1, 1, 1 trichloroethane from degreasing, machine cleaning and maintenance operations.
 - c. Spent heat transfer agent diethyl benzene which is flammable.

B. Equipment Inventory

All equipment used in the hazardous waste storage areas is from the Development Facility North production equipment list.

Typically a hand cart is used to move drums to, in and from the hazardous waste storage areas.

C. Closure Schedule

At this time, closure is not anticipated, however, discussions with the agency have indicated a need to select an arbitrary closure date. For this reason we have selected the year 2020.

1. Removal of inventory - to be done during first 30 days of closure.
2. Decontamination - All residues present will be removed and treated as a flammable or chlorinated waste as above. All remaining pallets will also be disposed of - all of which will be done during the next 30 days of closure.

ITEM II. Removal of Inventory

- A. All waste that is recyclable will be processed for reuse. Our present contract is Hydrite Chemical Company which utilizes the Hydrite Cottage Grove recycling operation.
- B. No treatment or disposal will occur at this facility.
- C. Consistent with our current operation, all drums will be properly labeled, inspected and manifested for shipment to a permitted disposal or recycle facility.

ITEM III. Facility Decontamination

A. Structure

The storage area catch basins and the floor of the storage areas will be scrubbed and all residue placed in a barrel and treated as contaminated waste. Hand tools and a mill floor scrubber will be used.

B. Equipment

All equipment used to decontaminate the structure will be cleaned by detergent and treated as contaminated waste. Steam, detergent and/or water will be used.

- C. Approximately a maximum of one 55 gallon drum of contaminated cleaning material will be generated and disposed of as the above inventory.
- D. All wooden pallets will be disposed of with the above inventory. They will be treated as a fuel source or landfilled.

The Mill Manager will monitor all closure activities to ensure conformance to this plan.

ITEM IV. Post Closure Plan

N/A.

ITEM V. Notice in Deed and Notice to Local Land Authority

N/A.

ITEM VI. Closure Cost Estimate

A. Closure Cost Estimate

	<u>1985</u>	<u>1986**</u>
1. <u>Removal of maximum inventory</u>		
40 drums x \$140.11/drum =	\$140.11	\$5828.58
2. <u>Decontamination</u>		
a. Structure		
10 hours x \$14/hr. x I.F.	145.60	151.42
b. Equipment		
5 hours x \$14/hr. x I.F.	72.80	75.71
c. Disposal of residue from decontamination		
2 drums x \$80/drum x I.F.	166.40	173.06
d. Disposal of pallets	50.00	52.00
Subtotal	14445.80	6280.77
3. <u>Administrative and Contingency</u>		
a. Administrative including paperwork associated with activities and 15% of subtotal	2166.87	942.12
b. Contingency 15% of subtotal	2166.87	942.12
Total	18779.54	8165.01

* Costs reflect updating by Inflation Factor (I.F.) for 1985.

Example: 100 drums x \$134.72/drum x \$1.04 = \$14011 (I.F. for 1985)

** 1986 cost reflects decrease in maximum drum capacity to 40 drums and I.F. of 1.04.

ITEM VII. Financial Assurance Mechanism for Closure

The Development Facility North has secured a bond for the Hazardous Waste storage facility as required by Wis. NR181. A 19225 bond from Safeco Insurance Company of America covers the period from December 11, 1985 through November 25, 1986. A copy of the bond is attached, along with verification letter regarding its increase for the inflation factor (see page 35b1).

In addition, the Federal Environmental Protection Agency's (EPA) financial test demonstrating adequate coverage for closure costs and liability insurance was completed and submitted. This document is attached.

ITEM VIII. Post Closure Cost Estimate

Since all wastes will be disposed of offsite, there will be no post-closure activities or costs.

ITEM IX. Financial Assurance Mechanism for Post Closure

Since all wastes will be disposed of offsite, there will be no post-closure activities or costs.

ITEM X. Liability Insurance

- A. Sudden Insurance is covered by the financial test.
- B. Non-Sudden Insurance is not required as we are not involved with waste treatment or disposal on-site.
- C. Financial Test - The most recent financial test prepared by the Corporation is attached.
- D. Variance Procedures - N/A.

ITEM XI. Adjustment Procedures - N/A

JOHNSON & HIGGINS

OF ILLINOIS, INC.

Business Established, New York 1845

INSURANCE BROKERS-AVERAGE ADJUSTERS
ACTUARIES-EMPLOYEE BENEFIT PLAN CONSULTANTS

NOV 13 1984

101 NO. WACKER DRIVE, CHICAGO ILL 60606
TEL 363-2456 AREA CODE 312

November 9, 1984

Ms. Priscilla Darling
Risk Management Department
Kimberly-Clark Corporation
401 N. Lake Street
Neenah, Wisconsin 54956

Bonds No. 909787 909784

Dear Priscilla:

Pursuant to your request of October 25, enclosed please note the two surety riders for the above captioned bonds which increase penalties as requested. Kindly see that the enclosures are properly signed and sealed prior to filing with the State of Wisconsin.

Our additional premium invoices for the increase plus the 1984 to 1987 renewal premiums will be forthcoming in a few days. Please feel free to call me if you have any questions regarding this matter.

Cordially,

Terri
Terri Erickson
Casualty Department

TE/db5
Enclosures

Boston
Atlanta
Dallas
Houston
Los Angeles
Miami
New York
Philadelphia
Portland
San Francisco
Seattle
Washington
Chicago
Cleveland
Denver
Detroit
Kansas City
Minneapolis
New Orleans
Newark
Phoenix
Pittsburgh
Portland
San Diego
San Jose
St. Louis
Tampa
Vancouver
Winnipeg

Boston
Atlanta
Dallas
Houston
Los Angeles
Miami
New York
Philadelphia
Portland
San Francisco
Seattle
Washington
Chicago
Cleveland
Denver
Detroit
Kansas City
Minneapolis
New Orleans
Newark
Phoenix
Pittsburgh
Portland
San Diego
San Jose
St. Louis
Tampa
Vancouver
Winnipeg

Boston
Atlanta
Dallas
Houston
Los Angeles
Miami
New York
Philadelphia
Portland
San Francisco
Seattle
Washington
Chicago
Cleveland
Denver
Detroit
Kansas City
Minneapolis
New Orleans
Newark
Phoenix
Pittsburgh
Portland
San Diego
San Jose
St. Louis
Tampa
Vancouver
Winnipeg

Boston
Atlanta
Dallas
Houston
Los Angeles
Miami
New York
Philadelphia
Portland
San Francisco
Seattle
Washington
Chicago
Cleveland
Denver
Detroit
Kansas City
Minneapolis
New Orleans
Newark
Phoenix
Pittsburgh
Portland
San Diego
San Jose
St. Louis
Tampa
Vancouver
Winnipeg



SAFECO INSURANCE COMPANY OF AMERICA
GENERAL INSURANCE COMPANY OF AMERICA
FIRST NATIONAL INSURANCE COMPANY
OF AMERICA
HOME OFFICE SAFECO PLAZA
SEATTLE WASHINGTON 98165

To be attached to and form a part of

Type of Bond Hazardous Waste Storage Bond

Bond No 909784

dated effective 11/25/81
(MONTH DAY YEAR)

executed by Kimberly-Clark Corporation, as Principal,
(PRINCIPAL)

and by Safeco Insurance Company of America, as Surety,
(SURETY)

in favor of State of WI Dept of Natural Resources
(OBLIGEE)

In consideration of the mutual agreements herein contained the Principal and the Surety hereby consent to changing
the bond penalty

From \$18,486.00

To \$19,225.00

Nothing herein contained shall vary, alter or extend any provision or condition of this bond except as herein expressly stated

This rider is effective 11/25/84
(MONTH DAY YEAR)

Signed and Sealed 11/7/84
(MONTH DAY YEAR)

Kimberly-Clark Corporation
By [Signature] Kelli Hays
PRINCIPAL
TITLE

Safeco Insurance Company of America
By [Signature] Alice Albano
SURETY
ATTORNEY-IN-FACT

InterOffice



Kimberly-Clark Corporation

To: John Eckert

Location: Atlas, WI

Date: December 11, 1985

From: Patricia White *PW*

Subject: BONDS

Per our phone conversation, I talked to Johnson and Higgins.
I gave them information to increase the limits of Bond # 909787
and 909784. Bond #909787 was increased to 55,018, and Bond #909784
was increased to 19,984.

If you need additional information, please call me.

PW



KNOW ALL

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a Washington

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and other c

ACKNOWLEDGMENT BY SURETY

STATE OF ILLINOIS
County of COOK } ss

On this 7th day of November, 1984, before me personally
appeared Alice Albano, known to me to be the Attorney-in-Fact of
SAFECO INSURANCE COMPANY OF AMERICA, GENERAL INSURANCE COMPANY OF AMERICA, FIRST NATIONAL
INSURANCE COMPANY OF AMERICA or SAFECO NATIONAL INSURANCE COMPANY, the corporation that executed the
this instrument, and acknowledged to me that such corporation executed the same

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal, at my office in the aforesaid County,
the day and year in this certificate first above written

Notary Public in the State of IL
County of Cook

Rose Mary Fanzio

(Seal)
S 230 RA 6 78

PRINTED IN U.S.A.

My Commission Expires Jan. 22 1985



POWER OF
ATTORNEY

SAFECO INSURANCE COMPANY OF AMERICA
GENERAL INSURANCE COMPANY OF AMERICA
HOME OFFICE SAFECO PLAZA
SEATTLE, WASHINGTON 98185

No 4666

KNOW ALL BY THESE PRESENTS:

That SAFECO INSURANCE COMPANY OF AMERICA and GENERAL INSURANCE COMPANY OF AMERICA, each a Washington corporation, does each hereby appoint

-----ALICE ALBANO-----

its true and lawful attorney(s)-in-fact with full authority to execute on its behalf fidelity and surety bonds or undertakings and other documents of a similar character issued in the course of its business, and to bind the respective company thereby

IN WITNESS WHEREOF, SAFECO INSURANCE COMPANY OF AMERICA and GENERAL INSURANCE COMPANY OF AMERICA have each executed and attested these presents

this 2nd day of November 1982

CERTIFICATE

Extract from the By-Laws of SAFECO INSURANCE COMPANY OF AMERICA
and of GENERAL INSURANCE COMPANY OF AMERICA:

"Article V, Section 13. — FIDELITY AND SURETY BONDS . . . the President, any Vice President, the Secretary, and any Assistant Vice President appointed for that purpose by the officer in charge of surety operations, shall each have authority to appoint individuals as attorneys-in-fact or under other appropriate titles with authority to execute on behalf of the company fidelity and surety bonds and other documents of similar character issued by the company in the course of its business. On any instrument making or evidencing such appointment, the signatures may be affixed by facsimile. On any instrument conferring such authority or on any bond or undertaking of the company the seal or a facsimile thereof may be impressed or affixed or in any other manner reproduced, provided, however, that the seal shall not be necessary to the validity of any such instrument or undertaking."

Extract from a Resolution of the Board of Directors of SAFECO INSURANCE COMPANY OF AMERICA
and of GENERAL INSURANCE COMPANY OF AMERICA adopted July 28, 1970:

"On any certificate executed by the Secretary or an assistant secretary of the Company setting out,

(i) The provisions of Article V, Section 13 of the By-Laws, and

(ii) A copy of the power-of-attorney appointment executed pursuant thereto, and

(iii) Certifying that said power-of-attorney appointment is in full force and effect,

the signature of the certifying officer may be by facsimile and the seal of the Company may be a facsimile thereof."

I, W D Hammersla, Secretary of SAFECO INSURANCE COMPANY OF AMERICA and of GENERAL INSURANCE COMPANY OF AMERICA, do hereby certify that the foregoing extracts of the By-Laws and of a Resolution of the Board of Directors of these corporations, and of a Power of Attorney issued pursuant thereto, are true and correct, and that both the By-Laws, the Resolution and the Power of Attorney are still in full force and effect

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the facsimile seal of said corporation

this 7th day of November 1982

March 21, 1985

Environmental Protection Agency
Waste Management Branch
230 S. Dearborn Street
Chicago, Illinois 60604

I am the Chief Financial Officer of Kimberly-Clark Corporation, Neenah, Wisconsin 54956. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265: See Attachment I - Atlas Mill and Development Facility North.

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: See Attachment I - Atlas Mill and Development Facility North.
2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.
3. In States where the EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified

in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: See Attachment I. Other facilities are covered under parallel regulations developed by their respective state and/or federal regulatory agencies.

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1984.

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

By:



Donald R. Hibbert

Vice Chairman of the Board, Treasurer and
Chief Financial Officer

March 21, 1985

ATTACHMENT I

Part A. Facility Closure Cost Estimates⁽¹⁾

<u>Facility</u> ⁽²⁾ <u>and Address</u>	<u>U.S. \$000</u> <u>EPA I.D. No.</u>	<u>Current Closure</u> ⁽³⁾ <u>Cost Estimate</u>
EPA Region 1:		
New Milford Mill	CTD 001453299	\$11
58 Pickett Dist. Rd.		
New Milford, CT 06776	Subtotal	<u>\$11</u>
EPA Region 4:		
Corinth Mills	MST 000623017	\$12
Kendrick Rd., Rt. 8		
Corinth, MS	Subtotal	<u>\$12</u>
EPA Region 5:		
Brown-Bridge - Plant 1	OHD 088648282	\$16
518 E. Water Street		
Troy, OH 45373		
Brown-Bridge - Plant 2	OHD 980569263	\$ 3
Marybill Drive		
Troy, OH 45373		
Atlas Mill	WID 006125959	\$53
425 W. Water St.		
P. O. Box 115		
Appleton, WI 54911		
Development Facility North	WID 000808444	\$18
1111 Henry St.		
Neenah, WI 54956	Subtotal	<u>\$90</u>
	Grand Total	<u>\$113</u>

(1) All facilities are located in states which maintain their own RCRA program. Connecticut and Mississippi have full Phase II authorization and Wisconsin and Ohio have Phase I.

(2) All of the above listed facilities are manufacturing locations which operate hazardous waste storage facilities.

(3) Post-closure costs are not applicable.

Part B. Closure or Post-Closure Care and Liability Coverage

Alternative 1

U.S. \$000

1. Sum of current closure and post-closure cost estimates	
Current closure	\$ 113
Post-closure	-
	<u>113</u>
2. Amount of annual aggregate liability coverage to be demonstrated	<u>2,000</u>
3. Sum of lines 1 and 2	\$ <u>2,113</u>
4. Total liabilities	
Total liabilities	\$1,600,400*
Less: Any portion of closure or post-closure cost estimates included in the "total liabilities" line	-
	<u>\$1,600,400</u>
5. Tangible net worth	
Stockholders' equity	\$1,572,236*
Less: Intangible assets	(20,261)
Tangible net worth	<u>\$1,551,975</u>
6. Net worth (stockholders' equity)	<u>\$1,572,236*</u>
7. Current assets	<u>\$ 918,478*</u>
8. Current liabilities	<u>\$ 701,812*</u>
9. Net working capital (line 7 minus line 8)	<u>\$ 216,666*</u>
10. Net income	\$ 224,980*
Plus: Depreciation.	125,257*
	<u>\$ 350,237*</u>
11. Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)	<u>\$1,862,157*</u>

Attachment I
Page 3

	<u>Yes</u>	<u>No</u>
12. Is line 5 at least \$10 million?	X	
13. Is line 5 at least 6 times line 3?	X	
14. Is line 9 at least 6 times line 3?	X	
15. Are at least 90% of assets located in the U.S.? If not, complete line 16.		X
16. Is line 11 at least 6 times line 3?	X	
17. Is line 4 divided by line 6 less than 2.0?	X	
18. Is line 10 divided by line 4 greater than 0.1?	X	
19. Is line 7 divided by line 8 greater than 1.5?		X

*Figures derived from the consolidated financial statements of Kimberly-Clark Corporation and Subsidiaries for the year ended December 31, 1984.

200 East Randolph Drive
Chicago, Illinois 60601
(312) 861-1161
TWX 910-221-2695

Kimberly-Clark Corporation:

We have examined the consolidated financial statements of Kimberly-Clark Corporation and Subsidiaries for the year ended December 31, 1984, and have issued our opinion thereon dated February 1, 1985. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

At your request, we have performed the procedures enumerated below with respect to the accompanying letter dated March 21, 1985, from Kimberly-Clark Corporation to the Regional Administrator - Environmental Protection Agency. This report is solely for filing with the Environmental Protection Agency in accordance with requirements of the Resource Conservation and Recovery Act and is not to be used for any other purpose. The procedures that we performed are summarized as follows:

1. We compared the amounts included in items 5, 6, 7, 8, 10, and 11 under the caption Alternative I in the letter referred to above with the corresponding amounts in the financial statements referred to in the first paragraph.
2. We recomputed from, or reconciled to, the financial statements referred to in the first paragraph the information included in items 4, 9, and 15 under the caption Alternative I in the letter referred to above.

Because the procedures referred to in the preceding paragraph were not sufficient to constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on any of the information or amounts listed under the caption Alternative I

in the aforementioned letter. In performing the procedures referred to above, however, no matters came to our attention that caused us to believe that the information or amounts included in items 4 through 11 and item 15 should be adjusted.

Deloitte Haskins & Sells

March 21, 1985

J. Other Federal Laws

Not Applicable

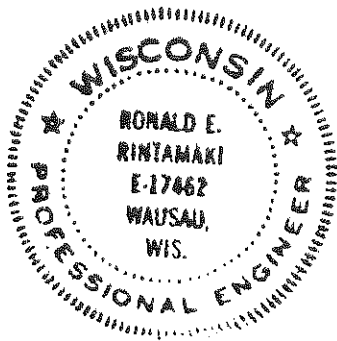
REFERENCES

1. National Oceanic and Atmospheric Administration, Environmental Data and Information Service, National Climatic Center, Asheville, NC. March 1979, Airport Climatological Summary. Climatology of the United States No. 90 (1965-1974) Green Bay, Wisconsin Austin Straubel Field.
2. City of Neenah, Department of Public Works, 211 Walnut, Neenah, WI 54956.
3. National Flood Insurance Program, Flood Insurance Rate Map, City of Appleton, Wisconsin, Community Panel Number 555542-0010-B.
4. Development Facility North Mill Technical Files.

I hereby certify that I have examined the facility, and being familiar with the provisions of 40CFR, 122.25, attest that this RCRA Part B Application has been prepared in accordance with good engineering practices.

RONALD E. RINTAMAKI

Printed Name of Registered Professional Engineer



Ronald E. Rintamaki

Signature of Registered Professional Engineer

Date: Oct 15, 1985 Registration No. E-17462 State of Wisconsin

CERTIFICATION

I certify under penalty of law that I have personally examined, and am familiar with, the information submitted in this document and all attachments, and that, based on my information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Date: 10/18/85 Signature: Marshall Smith

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

Name of Permittee: KIMBERLY CLARK - DEVELOPMENT FACILITY NORTH
Facility Location: 1111 S. HENRY ST., NEENAH, WI
EPA Identification Number: WID 000808444
Effective Date: _____
Expiration Date: _____

Authorized Activities

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (U.S. EPA) (codified and to be codified in Title 40 of the Code of Federal Regulations), a permit is issued to KIMBERLY CLARK (hereafter called the Permittee), to operate a hazardous waste STORAGE facility located in NEENAH, WI at latitude 44-10-035 and longitude 088-28-010. You are authorized to conduct the following hazardous waste management activities:

<input checked="" type="checkbox"/> Storage	<input type="checkbox"/> Treatment	<input type="checkbox"/> Disposal
<input checked="" type="checkbox"/> Container	<input type="checkbox"/> Tank	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Tank	<input type="checkbox"/> Surface Impoundment	<input type="checkbox"/> Landfill
<input type="checkbox"/> Waste Pile	<input type="checkbox"/> Incinerator	<input type="checkbox"/> Land Application
<input type="checkbox"/> Surface Impoundment	<input type="checkbox"/> Other	<input type="checkbox"/> Surface Impoundment

Applicable Regulations:

The conditions of this permit were developed in accordance with the applicable provisions of 40 CFR Part:

<input checked="" type="checkbox"/> 261	<input checked="" type="checkbox"/> 264, Subpart G	<input type="checkbox"/> 264, Subpart L
<input checked="" type="checkbox"/> 262	<input checked="" type="checkbox"/> 264, Subpart H	<input type="checkbox"/> 264, Subpart M
<input checked="" type="checkbox"/> 264, Subparts A-E	<input checked="" type="checkbox"/> 264, Subpart I	<input type="checkbox"/> 264, Subpart N
<input type="checkbox"/> 264, Subpart F	<input type="checkbox"/> 264, Subpart J	<input type="checkbox"/> 264, Subpart O
	<input type="checkbox"/> 264, Subpart K	<input checked="" type="checkbox"/> 270

Permit Approval

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264 and 270 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit (see 40 CFR §270.32(c)).

7/25/84

FINAL
REVISION

This permit is based on the assumption that the information submitted in the permit application attached to the Permittee's letter dated JUNE 28, 1985 JANUARY 2 1986, and any subsequent amendments (hereafter referred to as the application) is accurate and that the facility will be constructed and/or operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 CFR §270.42 and §270.43) and potential enforcement action. The Permittee must inform U.S. EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of _____, and shall remain in effect until _____, unless revoked and reissued, or terminated (40 CFR §270.41 and .43) or continued in accordance with 40 CFR §270.51.

Issued this _____ day of _____

by _____
Basil G. Constantelos, Director
Waste Management Division

7/25/84

I. STANDARD CONDITIONS

A. Effect of Permit

The Permittee is allowed to ~~STORE~~ hazardous waste in accordance with the conditions of this permit. Any ~~STORAGE~~ of hazardous waste not authorized in this permit or the RCRA regulations is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9606 (a), commonly known as CERCLA), or any other law providing for protection of public health or the environment.

B. Permit Actions

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 270.41, 270.42, and 270.43. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

C. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. Duties and Requirements

1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than non-compliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action; permit termination, revocation and reissuance, modification; or for denial of a permit renewal application, or other appropriate action.

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2. Duty to Reapply. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires, unless permission for a later date has been granted by the Regional Administrator.
3. Permit Expiration. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 40 CFR 270.13-270.29) and through no fault of the Permittee the Regional Administrator has not issued a new permit as set forth in 40 CFR 270.51.
4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
5. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.
6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory, and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.
7. Duty to Provide Information. The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and re-issuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.
8. Inspection and Entry. The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:
 - (a) Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

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- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- (d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Records.

- (a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, July, 1982; Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, March, 1979; or an equivalent method as specified in the attached Waste Analysis Plan.
- (b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
- (c) Records for monitoring information shall include:
 - (i) The date(s), exact place, method, and times of sampling measurements;
 - (ii) The individual(s) who performed the sampling or measurements;
 - (iii) The date(s) analyses were performed;

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- (iv) The individual(s) who performed the analyses;
- (v) The analytical technique(s) or method(s) used; and
- (vi) The result(s) of such analyses.

10. Reporting Planned Changes. The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.
11. Certification of Construction or Modification. The Permittee may not commence STORAGE of hazardous waste at the facility until:
 - (a) The Permittee has submitted to the Regional Administrator by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
 - (b)
 - (i) The Regional Administrator has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or
 - (ii) The Regional Administrator has either waived the inspection or has not within 15 days notified the Permittee of his or her intent to inspect.

[NOTE: This condition only applies to newly permitted facilities or to permitted facilities which have been modified.]
12. Anticipated Noncompliance. The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. Such notice does not constitute a waiver of the Permittee's duty to comply with permit requirements.
13. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR 270.41(b)(2) or 270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.
14. Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

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15. Twenty-four Hour Reporting. The Permittee shall report to the Regional Administrator any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

- (a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.
- (b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:
 - (i) Name, address, and telephone number of the owner or operator;
 - (ii) Name, address, and telephone number of the facility;
 - (iii) Date, time, and type of incident;
 - (iv) Name and quantity of materials involved;
 - (v) The extent of injuries, if any;
 - (vi) An assessment of actual or potential hazards to the environment and human health outside the facility, where applicable; and
 - (vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee need not comply with the five day written notice requirement if the Regional Administrator waives the requirement and the Permittee submits a written report within fifteen days of the time the Permittee becomes aware of the circumstances.

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16. Other Noncompliance. The Permittee shall report all instances of noncompliance not otherwise required to be reported under Condition I.D.15., at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in condition I.D.15.
17. Other Information. Where the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittee shall promptly submit such facts or information.
18. Submittal of Reports or Other Information. All reports or other information required to be submitted by the terms of this permit shall be sent to:

RCRA Activities
U.S. EPA, Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

- E. Signatory Requirement. All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR 270.11.
- F. Confidential Information. The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR 270.12.
- G. Documents To Be Submitted Prior to Operation.

THE PERMITTEE MUST SUBMIT A CURRENT COPY OF THEIR FINANCIAL ASSURANCE MECHANISM FOR CLOSURE, PER 40 CFR 264.143 PRIOR TO ISSUANCE OF THE PERMIT.

- H. Documents To Be Maintained at Facility Site. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:
- (1) Waste analysis plan as required by 40 CFR 264.13 and this permit.
 - (2) Personnel training documents and records as required by 40 CFR 264.16(d) and this permit.
 - (3) Contingency plan as required by 40 CFR 264.53(a) and this permit.
 - (4) Closure plan as required by 40 CFR 264.112(a) and this permit.

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- (5) Cost estimate for facility closure as required by 40 CFR 264.142(d) and this permit.
- (6) Operating record as required by 40 CFR 264.73 and this permit.
- (7) Inspection schedules as required by 40 CFR 264.15(b) and this permit.

II. GENERAL FACILITY CONDITIONS

- A. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.
- B. Required Notice.
- (1) The Permittee shall notify the Regional Administrator in writing at least four weeks in advance of the date the permittee expects to receive hazardous waste from a foreign source. Notice of subsequent shipments of the same waste having the same EPA hazardous waste number from the same foreign source is not required.
 - (2) When the Permittee is to receive hazardous waste from an off-site source [except where the Permittee is also the generator], it must inform the generator in writing that it has the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record. (See Condition II.L.1).
- C. General Waste Analysis. The Permittee shall comply with the procedures described in the attached waste analysis plan, Attachment 1.
- D. Security. The Permittee shall comply with the security provisions of 40 CFR 264.14(b) and (c).
- E. General Inspection Requirements. The Permittee shall follow the inspection schedule, Attachment 2. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR 264.15(c). Records of inspections shall be kept as required by 40 CFR 264.15(d).
- F. Personnel Training. The Permittee shall conduct personnel training as required by 40 CFR 264.16. This training program shall follow the attached outline, Attachment 3. The Permittee shall maintain training documents and records as required by 40 CFR 264.16(d) and (e).
- G. General Requirements for Ignitable, Reactive, or Incompatible Waste. The Permittee shall comply with the requirements of 40 CFR 264.17(a).
- H. Location Standards.

I. Preparedness and Prevention

1. Required Equipment. The Permittee shall equip the facility with the equipment set forth in the contingency plan, Attachment 4, as required by 40 CFR 264.32.
2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in Condition 11.1.1 as necessary to assure its proper operation in time of emergency. Such testing and maintenance activities are set forth in the inspection schedule, Attachments 2 and 4.
3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR 264.34.
4. Required Aisle Space. The Permittee shall maintain aisle space as required by 40 CFR 264.35.
5. Arrangements with Local Authorities. The Permittee shall attempt to make arrangements with State and local authorities as required by 40 CFR 264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

J. Contingency Plan.

1. Implementation of Plan. The Permittee shall immediately comply with the provisions of the contingency plan, Attachment 4, and follow the emergency procedures described by 40 CFR 264.56 whenever there is a fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment.
2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR 264.53.
3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 40 CFR 264.54.
4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR 264.55, concerning the emergency coordinator.

K. Manifest System. The Permittee shall comply with the manifest requirements of 40 CFR 264.71, 264.72, and 264.76.

L. Recordkeeping and Reporting.

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR 264.73(a), (b)(1), (2), (3), (4), (5), (6), and (8).

2. Biennial Report. The Permittee shall comply with the biennial report requirements of 40 CFR 264.75.

M. Closure.

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR 264.111 and in accordance with the closure plan, Attachment 5 .

2. Amendment to Closure Plan. The Permittee shall amend the closure plan in accordance with 40 CFR 264.112(b) whenever necessary.

3. Notification of Closure. The Permittee shall notify the Regional Administrator at least 180 days prior to the date it expects to begin closure.

4. Time Allowed For Closure. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, Attachment 5 . After receiving the final volume of hazardous waste, the Permittee shall complete closure activities in accordance with the schedule specified in the closure plan, Attachment 5 .

5. Disposal and/or Decontamination of Equipment. When closure is completed, the Permittee shall decontaminate and/or dispose of all facility equipment as required by 40 CFR 264.114 and the closure plan, Attachment 5 .

6. Certification of Closure. When closure is completed, the Permittee shall certify to the Regional Administrator that the facility has been closed in accordance with the specifications in the closure plan as required by 40 CFR 264.115.

N. Cost Estimate for Facility Closure. The Permittee's original closure cost estimate, prepared in accordance with 40 CFR 264.142(a), is specified in Attachment 5.

1. The Permittee must adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared, as required by 40 CFR 264.142(b).
2. The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan as required by 40 CFR 264.142(c).
3. The Permittee must keep at the facility the latest closure cost estimate as required by 40 CFR 264.142(d).

O. Financial Assurance for Facility Closure. The Permittee shall demonstrate continuous compliance with 40 CFR 264.143 by providing documentation of financial assurance, as required by 40 CFR 264.151, in at least the amount of the cost estimates required by permit condition II.N. Changes in financial assurance mechanisms must be approved by the Regional Administrator pursuant to 40 CFR 264.143.

P. Liability Requirements. The Permittee shall demonstrate continuous compliance with the requirements of 40 CFR 264.147 and the documentation requirements of 40 CFR 264.151, including the requirements to have and maintain liability coverage for sudden and accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs.

Q. Incapacity of Owners or Operators, Guarantors, or Financial Institutions.
The Permittee shall comply with 40 CFR 264.148 whenever necessary.

R. WASTE MINIMIZATION

THE PERMITTEE MUST CERTIFY, AT LEAST ANNUALLY, THAT A PROGRAM IS IN PLACE TO REDUCE THE VOLUME AND TOXICITY OF HAZARDOUS WASTE GENERATED TO THE DEGREE DETERMINED BY THE PERMITTEE TO BE ECONOMICALLY PRACTICAL; AND THE PROPOSED METHOD OF TREATMENT OR STORAGE IS THAT PRACTICAL METHOD CURRENTLY AVAILABLE TO THE PERMITTEE WHICH MINIMIZES THE PRESENT AND FUTURE THREAT TO HUMAN HEALTH AND THE ENVIRONMENT, PURSUANT TO 40 CFR 264.73 (b)(9)

III. STORAGE IN CONTAINERS

- A. Waste Identification. The Permittee may store a total volume of ~~2200 GAL~~ of the following wastes in containers at the facility, subject to the terms of this permit:
- 15 DRUMS OF F001 WASTE (825 GALLONS)
- 25 DRUMS OF D001 WASTE (1375 GALLONS)
- B. Condition of Containers. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit.
- C. Compatibility of Waste with Containers. The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 40 CFR 264.172.
- D. Management of Containers. The Permittee shall manage containers as required by 40 CFR 264.173.
- E. Containment. The Permittee shall ~~construct~~ and operate and maintain the containment system in accordance with the requirements of 40 CFR 264.175 as specified in the attached plans and specifications, Attachment 6.
- F. Special Requirements for Ignitable or Reactive Waste. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.

G. Special Requirements for Incompatible Waste.

1. Prior to placing incompatible wastes or incompatible wastes and materials in the same container, the Permittee shall comply with 40 CFR 264.17(b) as specified in Attachment .
2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.
3. The Permittee shall separate containers of incompatible wastes as indicated in the attached plans, Attachment , as required by 40 CFR 264.177(c)

NOT
APPLICABLE

4. ~~The Permittee must document compliance with conditions III.G. (1) and (2) as required by 40 CFR 264.17(c) and place this documentation in the operating record (condition II.L.1).~~

NOT
APPLICABLE

1. STANDARD CONDITIONS

Permit conditions I.A to I.H are regulatory requirements of 40 CFR Part 270. These conditions are of a general nature and are applicable to all hazardous waste management facilities regulated pursuant to a U.S. EPA RCRA permit.

<u>Permit Condition</u>	<u>Subject</u>	<u>Regulation (40 CFR)</u>
I.A	Effect of Permit	§270.4 & 270.30(g)
I.B	Permit Actions	§270.30(f), 270.41, §270.42, 270.43 & §264.112
I.C	Severability	§270.32(a)
I.D.1	Duty to Comply	§270.30(a)
I.D.2	Duty to Reapply	§270.30(b) & 270.10(h)
I.D.3	Permit Expiration	§270.51
I.D.4	Need to Halt or Reduce Activity not a Defense	§270.30(c)
I.D.5	Duty to Mitigate	§270.30(d)
I.D.6	Proper Operation and Maintenance	§270.30(e)
I.D.7	Duty to Provide Information	§270.30(h) & 264.74(a)
I.D.8	Inspection and Entry	§270.30(i)
I.D.9	Monitoring and Records	§270.30(j)
I.D.10	Reporting Planned Changes	§270.30(1)(1)
I.D.11	Certification of Construction Modification	§270.30(1)(2)
I.D.12	Anticipated Noncompliance	§270.30(1)(2)
I.D.13	Transfer of Permits	§270.30(1)(3) 270.40 & §264.12(c)
I.D.14	Compliance Schedules	§270.30(1)(5) & 270.33
I.D.15	Twenty-Four Hour Reporting	§270.30(1)(6) & 264.56 (d), (i) and (j)
I.D.16.	Other Noncompliance	§270.30(1)(10)

<u>Permit Condition</u>	<u>Subject</u>	<u>Regulation (40 CFR)</u>
I.D.17	Other Information	§270.30(1)(11)
I.E	Signatory Requirement	§270.11 & 270.30(k)
I.F	Confidential Information	§270.12
I.G	Documents To Be Submitted Prior to Operation (FINANCIAL ASSURANCE FOR CLOSURE)	§270.14(b) 264.143 §264.15 §264.16 §264.52 §264.110 §264.140 §264.147
I.H	Documents To Be Maintained At Facility Site	§264.13(b) §264.53(a) §264.112(a) §264.16(d) §264.73 §264.15(b) §264.142(a)

II. GENERAL FACILITY CONDITIONS

<u>Permit Condition</u>	<u>Subject</u>	<u>Regulation (40 CFR)</u>
II.A.	Design and Operation of Facility	§264.31
II.B.	Required Notice	§264.12
II.C.	General Waste Analysis	§264.13
II.D.	Security	§264.14
II.E.	General Inspection Requirements	§264.15
II.F.	Personnel Training	§264.16
II.G.	General Requirements for Ignitable, Reactive and Incompatible Waste	§264.17
II.H.	Location Standards	Not Applicable
II.I.1.	Required Equipment	§264.32
II.I.2.	Testing and Maintenance of Equipment	§264.33
II.I.3.	Access to Communications or Alarm System	§264.34
II.I.4.	Required Aisle Space	§264.35
II.I.5.	Local Authorities	§264.37
II.J.1.	Implementation of Contingency Plan	§264.51
II.J.2.	Copies of the Contingency Plan	§264.53
II.J.3.	Amendments to the Contingency Plan	§264.54
II.J.4.	Emergency Coordinator	§264.55
II.K.	Manifest System	§264/71, §264/72, §264/76 §270.30(1)(7), §270.30 (1)(8)
II.L.1	Operating Record	§264.73
II.L.2.	Biennial Report	§264.75, §270.30(1)(9)

<u>Permit Condition</u>	<u>Subject</u>	<u>Regulation (40 CFR)</u>
II.M.1.	Closure Performance Standard	§264.111
II.M.2.	Amendment to Closure Plan	§264.112(b)
II.M.3.	Notification of Closure	§264.112(c)
II.M.4.	Time Allowed for Closure	§264.113
II.M.5.	Disposal or Decontamination of Equipment	§264.114
II.M.6.	Certification of Closure	§264.115
II.N	Closure Cost Estimate	§264.142
II.O.	Financial Assurance for Facility Closure	§264.143
I.P.	Liability Requirements	§264.147
II.Q.	Incapacity of Owners or Operators, Generators or Financial Institutions	§264.148
II.R.	Waste Minimization	Hazardous and Solid Waste Amendments of 1984, (HSWA) Section 224

<u>Permit Conditions</u>	<u>Subject</u>	<u>Regulation (40 CFR)</u>
III.	Storage In Containers	
III.A.	Waste Identification	§264.112(a)(2)
III.B.	Condition of Containers	§264.171
III.C.	Compatibility of Wastes with Containers	§264.172
III.D.	Management of Containers	§264.173
III.E.	Containment	§264.175
III.F.	Special Requirements for Ignitable or Reactive Waste	§264.176
III.G.	Special Requirements for Incompatible Waste	§264.177

NOT APPLICABLE

IV.	Storage In Tanks	
IV.A.	Waste Identification	§261.
IV.B.	Design of Tanks	§264.191
IV.C.	General Operating Requirements	§264.192
IV.D.	Special Requirements for Ignitable or Reactive Wastes	§264.198
IV.E.	Special Requirements for Incompatible Wastes	§264.199
IV.F.	Compliance Schedule	*

WID 000808444

LIST OF ATTACHMENTS
FOR DRAFT PERMIT

ATTACHMENT NUMBER

- | | |
|---|---------------------|
| 1 | WASTE ANALYSIS PLAN |
| 2 | INSPECTIONS |
| 3 | PERSONNEL TRAINING |
| 4 | CONTINGENCY PLAN |
| 5 | CLOSURE PLAN |
| 6 | CONTAINER STORAGE |

WID 000 808444

ATTACHMENT 1

WASTE ANALYSIS PLAN

C. WASTE CHARACTERISTICS

1. List of Hazardous Waste Stored at Facility: Hazardous wastes are stored at this facility in 55 gallon drum containers. Current inventory consists of about 10 containers. Halogenated hydrocarbon waste (F001) and ignitable wastes (D001) are generated or stored here. No incompatibility exists involving the wastes. Closed cup flash point of the ignitable waste is below 140°F. See attached analysis A,B.

2. Waste Analysis Plan

- a. Parameters and Rationale for their Selection:

<u>Hazardous Waste</u>	<u>Process Generating Waste</u>	<u>Parameter</u>	<u>Rationale</u>
D001 Laboratory, Maintenance solvent liquid mixture, heat transfer agent	Laboratory Testing Painting Cleaning, Con- taminated heat Heat Transfer Agent	Ignitability	The waste is listed as haz- ardous due to flash point in liquid form
F001-Degreasing waste (spent halogenated solvents)	Degreasing	Toxicity	Listed-spent halogenated sol- vents are found in this waste

- b. Analyses were carried out in accord with U.S. EPA procedures described in 40 CFR Part 265.21

D001 - Ignitability is tested by the closed cup flash point method.

F001, is assumed to be hazardous. Concentrations of specific solvents are determined by GC/MS. Solvent concentrations are estimated using peak retention times and heights to approximate solvent identification and amount.

- c. Sampling Methods: Representative composite grab samples from spent ink solvent drums are taken at the facility. Facility does not analyze waste but submits samples to approved outside laboratories or EPA permitted treatment facilities for analysis. A small hand pump is used to obtain a sample within a barrel after thorough mixing. A composite is obtained from several random barrels. Only Facility personnel, with proper training, perform the sampling procedures. See 7A-7j for specific sampling method.
 - d. Frequency of sampling and analysis is yearly. In the event of significant process changes more frequent analyses would be performed at the discretion of facility manager.
 - e. Additional requirements for waste generated offsite - N/A. This facility only handles on-site generated wastes.

As described in Title 40 Part 261, App. II, the sampling procedure used is the "COLIWASA" or equivalent method capable of yielding a representative sample within the meaning of Part 260.* For elaboration, the paragraphs which fairly describe the method is included with references to Part 261, App. II and 264.13(b)(4).

APPROXIMATELY 50 TO 100 GALLONS OF TOTAL WASTE
ARE GENERATED MONTHLY, PER PART B APPLICATION
PAGE 10a.

* "EPA Test Methods for Evaluating Solid Waste, Physical/
Chemical Methods", July 1982, FW846, 2nd Ed.

Procedure

1. Clean Coliwasa.
2. Adjust sampler's locking mechanism to ensure that the stopper provides a tight closure. Open sampler by placing stopper rod handle in the T-position and pushing the rod down until the handle sits against the sampler's locking block.
3. Slowly lower the sampler into the waste at a rate that permits the level of liquid inside and outside the sampler to remain the same. If the level of waste in the sampler tube is lower inside than outside, the sampling rate is too fast and will produce a nonrepresentative sample.
4. When the sampler hits the bottom of the waste container, push sampler tube down to close and lock the stopper by turning the T-handle until it is upright and one end rests on the locking block.
5. Withdraw Coliwasa from waste and wipe the outside with a disposable cloth or rag.

Note: The procedure discussed above should be used on all four types of wastes. It is planned to sample at least every third drum of waste, if there is a reason to believe that there has been a significant change in the waste's characteristics from the original description given in this application.



HYDRITE CHEMICAL CO.

Mar 27 1985

P.O. BOX 158 COTTAGE GROVE, WISCONSIN 53527-0158 608/257-5892

WASTE SOLVENT SAMPLE ANALYSIS REPORT

DATE: March 26, 1985CODE NO.: 5654---10COMPANY: K. Clark Atlas Mill
Appleton, WISITE: 1,1,1 Trichloroethane
(Use)% RECOVERY 75 ± 5
(Distillation)

METHOD

Chromatographic pH 6.6Sulfuric Acid Acid Acceptance Other (Wd = 1.234)LABEL: Non-flammableSALESPERSON: Dick TerryProcessing Classifications: Purchase; AcquireComments: DOT Proper Shipping Name: Waste1,1,1 TrichloroethaneDOT Hazard Class: ORM-AUN/NA No.: UN 2831EPA Waste Code No. F002Analysis No.: 503055 rd

ANALYSIS

Actives:

☒ Acetone
☒ Methyl Ethyl Ketone
☒ Ethyl Acetate
☒ Glycol Ether EM
☒ Isopropyl Acetate
☒ n-Propyl Acetate
☒ Glycol Ether EE
☒ Methyl Isobutyl Ketone
☒ Isobutyl Acetate
☒ n-Butyl Acetate
☒ Glycol Ether EEAc
☒ Glycol Ether EB
☒

Alcohol:

☒ H₂O
☒ Methanol
☒ Ethanol
☒ Isopropanol
☒ n-Propanol
☒ Isobutanol
☒ n-Butanol
☒
☒

Diluents:

☒ Toluene
☒ Xylene
☒ Mineral Spirits
☒ Stoddard Solvent
☒ VM&P Naphtha
☒ Heptane
☒ Hexane
☒

Chlorinated:

☒ Methylene Chloride
100 ☒ 1,1,1 Trichloroethane
☒ Trichloroethylene
☒ Perchloroethylene
☒ (1,1,2-Trichloro-
1,2,2-Trifluoroethane)
☒

Other:

☒



BADGER LABORATORIES & ENGINEERING CO INC

1110 S ONEIDA STREET • APPLETON, WISCONSIN 54915 • (414) 239-3213

TOLL FREE PHONE IN WISCONSIN 1-800-242-3556

Your Purchase Order No. DF 25127

Two (2) Waste Samples

Received May 28, 1985

Our Report No. 151550

Issued June 13, 1985

KIMBERLY-CLARK CORPORATION
Development Facility North
1111 Henry Street
Neenah, WI 54956

Att'n: Mr. John C. Eckert

Request: Flash point percent volatile determination on the above samples.

Results:

Waste Hydro Degreaser

Flash Point (Closed Cup) °F	470
% Volatile @ 103°C	95.6
% Remaining (Oil)	4.4

Waste Alcohol

Flash Point (Closed Cup) °F	470
% Volatile @ 103°C	99.6
% Remaining	0.4

Method: Flash Point - Pensky Martin Closed Cup Flash Tester.
Volatiles - Oven Dry 103°C.

BADGER LABORATORIES & ENGINEERING

Stephen C. Taylor
Chief Chemist

SCT:EW

ATTACHMENT 2

INSPECTION SCHEDULE

F. SECURITY

1. Procedures and Equipment

Please see Sections B.2 and B.4.

Warning Signs

Signs which are legible from a distance of 25 feet are posted at all fence gates and several other fence locations around the active portion of the facility; these signs are visible from all angles of approach, and bear the legend "Danger - Unauthorized Personnel Keep Out". Also, "No Smoking" signs which are legible for a distance of 25 feet have been placed in the container storage areas.

2. Inspection Schedule

- a. The facility is inspected weekly by the Process Engineer to make sure of the following:

<u>AREA/EQUIPMENT</u>	<u>SPECIFIC ITEM</u>	<u>TYPES OF PROBLEMS</u>	<u>FREQUENCY INSPECTION</u>
Safety And Emergency	Standard industrial (Sorb-All, Vermiculite, etc. 55-gallon drums (steel, stainless steel)	Out of Stock Corrosion, structural damage	Monthly/As Needed Weekly
	Extra protective eyeglasses	Broken or dirty equipment	Monthly
	Fire blankets	Dispensing	As Used
	Fire extinguishers	Needs recharging	Monthly/After Each Use
	Fire alarm system	Power failure	Per NFPA
	Telephone system	Power failure	Per NFPA
	Public address (PA) system	Power failure, speakers	Per NFPA
	Emergency lighting system	Battery failure, lights	Per NFPA
	First aid equipment and supplies	Items out of stock inoperative	As Used
	Protective clothing (gloves and foot coverings)	Holes, normal wear and tear	As Used
Security Devices	Facility fence	Corrosion, damage to chain-link fence or barbed wire	Weekly
	Container storage area fence	Corrosion, damage to chain-link fence or barbed wire	Weekly
	Container storage area gate and lock	Corrosion, damage to chain-link fence or barbed wire, sticking or corroding lock	Weekly
	Two-way radios	Transmitter or receiver	Upon Failure
Operating and Structural Equip- ment	Dikes	Cracks, deterioration	Weekly
	Bases or foundations	Erosion; uneven settlement; cracks and spalling in concrete pads, base rings and piers, deterioration of water seal between tank bottom and foundation, wet spots	Weekly
	Ramps	Erosion, uneven settlement; cracks and spalling in concrete	Weekly

<u>AREA/EQUIPMENT</u>	<u>SPECIFIC ITEM</u>	<u>TYPES OF PROBLEMS</u>	<u>FREQUENCY OF INSPECTION</u>
Container Storage	Container placement and stacking	Aisle space, height of stacks	Weekly
	Sealing of containers	Open lids	Weekly
	Labeling of containers	Improper identification date missing	Weekly
	Containers	Corrosion, leakage, structural defects	Weekly
	Pallets	Damaged (e.g., broken wood wrapping, nails missing)	Weekly
	Fence, gate & lock	Corrosion, damage to chain-link fence, sticking or corroding lock	Weekly
	Base or foundation	Cracks, spalling, uneven settlement, erosion, wet spots	Weekly
	Dikes	Cracks, deterioration	Weekly
	Debris & Refuse	Aesthetics, Weekly possible reaction with leaks	Weekly
	Warning signs	Damaged	Weekly

DATE: TIME: INSPECTOR'S NAME:

SAFETY AND EMERGENCY EQUIPMENT, SECURITY DEVICES AND STRUCTURAL EQUIPMENT INSPECTED

ITEM	OBSERVATIONS		REPAIRS
	OK	NEEDS ATTENTION	
AREA 1			
House Keeping, Orderliness			
Drum Inventory Reconciliation			
Drum Marking, Labeling			
Drum Leaking			
Exhaust Fans Operational			
Warning Signs In Place			
Excessive Odor			
Normal Temperature			
Emergency Lighting Operational			
#90 Bay 4 Comp. RM.E 10# CO2 Ext.			
Protective Gloves, Goggles			
Absorbent Material			
Catch Tank Empty			
Adequate Aisle Space *			
Alarm System Operational			
Structural Integrity of Base			

* Sufficient aisle space is maintained to allow the movement of personnel, fire protection equipment, or spill control equipment during an emergency.

ITEM	OBSERVATIONS		REPAIRS
	OK	NEEDS ATTENTION	
AREA 4			
House Keeping, Orderliness			
Drum Inventory Reconciliation			
Drum Marking, Labeling			
Drum Leaking			
Exhaust Fans Operational			
Warning Signs in Place			
Excessive Odor			
Normal Temperature			
Lighting Operational			
#114 Dry A30E 30# Ext.			
Protective Gloves, Goggles			
Absorbent Material			
Catch Tank Empty			
Adequate Aisle Space*			
Security Lock in Place			
Helper Present for Safety			
Structural Integrity of Base			

* Sufficient aisle space is maintained to allow the movement of personnel, fire protection equipment, or spill control equipment during an emergency.

b. Remedial Action

If inspections reveal that non-emergency maintenance is needed, they will be completed as soon as possible to preclude further damage and reduce the need for emergency repairs. If a hazard is imminent or has already occurred during the course of an inspection or any time between inspections, remedial action will be taken immediately. Development Facility North personnel will notify the appropriate authorities per the Contingency Plan (see Section G) and initiate remedial actions. In the event of an emergency involving the release of hazardous constituents to the environment, efforts will be directed towards containing the hazard, removing it, and subsequently decontaminating the affected area. Refer to the Contingency Plan for further details.

c. Inspection Log

An inspection log is maintained for each calendar year in a three-ring binder. After an inspection, each log sheet is filled in the binder, which provides a case history of any item. The inspection log notebook is always kept with the inspection schedule in the Process Engineer's office. As required, records of inspection are kept for at least three years from the date of inspection.

3. Waiver of Preparedness and Prevention Requirements

The applicant does not wish to request a waiver of the preparedness and prevention requirements under 40 CFR 264 Subpart C. Requirements of this Subpart are primarily addressed in Section D, Section F, and Section G of this application.

a. Equipment Requirements

Internal and external communications, emergency equipment, and fire control equipment are discussed in Section F and Section G.

b. Aisle Space Requirements

Adequate aisle space will be available to allow easy access to all drums.

4. Preventative Procedures, Structure, and Equipment

a. See Section D (Process Information) (2) Container Management Practices.

b. No spills are allowed to accumulate. They are handled promptly under Contingency Plan. See Section G. (Contingency Plan) (12) Emergency Procedures.

- c. Equipment power failures would not affect our operation.
- d. Personnel Protection Equipment (safety glasses, boots and gloves) is available as needed from the Small Stores Supervisor.

5. Ignitable Waste Handling

The storage areas are located 50 feet from the property line as shown in figure 4.

Signs are posted warning "No Smoking" and are strictly enforced.

There are no sources of ignition near the hazardous waste storage areas. All wastes stored are compatible with each other.

6. Emergency Equipment Accessibility

The following items are inspected during the weekly inspections of hazardous waste storage areas:

- a. Sufficient aisle space is maintained to allow the unobstructed movement of personnel, fire protection equipment, or spill control equipment during an emergency.

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ATTACHMENT 3

PERSONNEL TRAINING

H.

PERSONNEL TRAINING

Outline of Training Program (Figures 8 and 9) shows the organization of personnel at the Development Facility North regarding hazardous waste activities. Positions which are directly involved with the handling of hazardous waste:

- Process Engineer
- Laboratory Supervisor
- Operations Manager
- Operations Superintendent*
- Dispatcher Receiver
- Warehouse Materials Coordinator
- Maintenance Service Operator - Oiler

*For Resource Conservation and Recovery Act, the Operations Superintendent is considered a "Shift Leader" for Hazardous Waste Facility operations and training.

Figure B - Job Title and Duties

Position Title: Process Engineer
Resource Conservation and Recovery Act Duties

Name of Incumbent: John C. Eckert

Position Responsibilities and Duties re: RCRA:

- Emergency Coordinator for all hazardous waste activities.
- Training of plant personnel in the proper handling of raw materials, intermediates, finished products, and waste byproducts.
- Responsible for all air, water, and solid waste control systems on the site.
- Obtains all required permits and licenses or modifications of same from local, state, and Federal regulatory bodies.
- Resolves problems involving permits and licenses from local, state, and Federal regulatory agencies.
- Notifies proper authorities in emergency situation.
- Reports to Mill Manager.
- Regularly inspects plant grounds and all facilities for status of air, water, and solid/hazardous waste emissions and controls.
- Consults with Shift Leader on questions involving emergency action.
- Drafts and submits to mill manager all required reports to EPA or the State.
- Schedules all maintenance and repairs to structures and equipment for HWM facility.
- Responsible for all labeling, marking and placarding for RCRA and DOT Regulations.
- Maintains operating log, monitoring records, maintenance records, inspection records, personnel training records, and all other required records.
- Audits procedures for all hazardous waste facility operations.

Experience and Qualifications:

- B.S. Degree in Chemistry
- Seven years experience in industrial pollution control management.
- Training professional short courses in hazardous chemicals, hazardous chemical waste management in-house seminars. Consultation with in-house Environmental Staff and US-EPA and Wisconsin DNR.

Position Title(s): Operations Superintendent
Shift Leader
Laboratory Supervisor

Name of Employee(s): R. A. Neubauer
D. G. Tanguay
A. E. Schuette
R. J. Vanevenhoven
A. R. Neumann
J. E. Laumer
D. L. Hildebrandt

Position Responsibilities and Duties regarding RCRA:

- Overall operation and maintenance of the hazardous waste storage facility.
- Maintains facility compliance with RCRA and other permits.
- Oversees operators and reviews their performance.
- Trains operators to:
 - Operate materials/drum handling equipment safely and effectively.
 - Handle leaks, spills, and emergency situations.
- Notifies plant environmental engineer, plant manager, and if so directed, proper authorities in emergency situations.
- Reports to Operations Manager (R. W. Hodges, Group A Emergency Contact)
- Interface with Process Engineer regarding all RCRA activities.
- Inspects emergency equipment on a regular basis.
- Ensures that at least two people are present for operations in area 4.

Experience and Qualifications:

- All H. S. Diploma.
- All minimum 5 years experience.
- All proceeding with in-mill training programs regarding RCRA activities. Other pertinent information contained in personnel file.

Position Title: Dispatcher Receiver

Name of Incumbent: P. Bergner
M. Nabbefeldt
D. Smith

Position Responsibilities and Duties regarding RCRA:

- Reports to Shift Leader.
- Reviews all generated wastes and assigns wastes to proper storage location.
- Inspects drum storage area for evidence of leaks and spills and inappropriately placed drums.
- Assists in training of new operators and mechanics to handle hazardous waste spills and leaks safely in such a way as to avoid exposures.
- Notifies Shift Supervisor and other plant authorities as necessary in emergency situations.
- Takes emergency action on own authority in accordance with established procedures.
- Assigns or is present with another person when carrying out duties in area 4.

Experience and Qualifications:

- High School Diploma.

Note: Training in hazardous waste handling procedures is conducted by Development Facility North.

Position Title: Warehouse Materials Coordinator

Name of Incumbent: R. Larsen

Position Responsibilities and Duties regarding RCRA:

- Reports to Shift Leader
- Reviews all generated wastes and assigns wastes to proper storage location.
- Inspects drum storage area for evidence of leaks and spills and inappropriately placed drums.
- Assists in training of new operators and mechanics to handle hazardous waste spills and leaks safely in such a way as to avoid exposures.
- Notifies Shift Supervisor and other plant authorities as necessary in emergency situations.
- Takes emergency action on own authority in accordance with established procedures.
- Assigns or is present with another person when carrying out duties in area 4.

Experience and Qualifications:

- High School Diploma.

Note: Training in hazardous waste handling procedures is conducted by Development Facility North

Position Title: Oiler

Name Of Employee(s): J. Rymer - Supervisor
R. Hartung
R. Gischia
J. Sherry
J. Lindsley
E. Lorenz
M. Pechotta
S. Houg
J. Behling

Alternates for Operations Superintendent
Shiftleader
Warehouse Materials Coordinator
Oiler

D. Franz
J. Banda
J. Allen
D. Please
M. Haddock
J. Debroka
C. Ragens
W. Schultz

Position responsibilities and duties regarding RCRA:

- Reports to Shift Leader.
- Fills drums with hazardous waste.
- Inspects drums for leaks, proper bungs.
- Assists in training new operators in proper handling procedures.
- Notifies Shift Leader and other plant authorities as necessary in emergency situations.
- Takes emergency action on own authority in accordance with established procedures.
- Conducts duties in area 4 only with another person present for safety and alarm purposes.

Experience and qualifications:

- See mill personnel records.

TRAINING CONTENT, FREQUENCY AND TECHNIQUE

The training program used at the Development Facility North (DFN) is based on the Kimberly-Clark "Hazardous Wastes Handbook". Provisions are made for updating or revising the text as necessary to ensure compliance with the terms of the RCRA permit. An outline of the Handbook and training levels is shown in Figure 9. The Handbook is kept on file at the Development Facility North and is available to EPA officials for review.

During the training program, employees are instructed on (1) the hazardous nature of chemicals and chemical wastes in general, (2) the purpose of RCRA and importance of maintaining compliance with RCRA regulations, (3) the hazardous nature of the wastes being stored in the facility, (4) proper handling and storage procedures for wastes, (5) Emergency Procedures and Contingency Plan.

The Hazardous Waste Handbook is used as the framework for training DFN personnel in the proper procedures, equipment and systems to be used in managing hazardous wastes.

The training program is designed to teach proper handling procedures for hazardous waste. It also teaches proper response to emergency situations. Training teaches employees that under no circumstances is there to be a deviation from hazardous waste compliance. In conjunction with the DFN Fire Procedures (on file at DFN) the following nonroutine training elements are included:

- Procedures for locating, using, inspecting, repairing, and replacing facility emergency equipment.
- Emergency communication procedures and alarm systems.
- Response to fires or explosions.
- Response to spills, and procedures for containing, controlling and mitigating such spills.
- Shutdown of operations and power failure procedures.

In conjunction with this, the City of Neenah Fire Department is available for response to all fires and other general plant emergencies. The DFN conducts extensive annual fire safety training programs in conjunction with Fire Prevention Week in October and other training sessions throughout the year.

FIGURE 9

OUTLINE OF HAZARDOUS WASTE TRAINING HANDBOOK

TRAINING LEVEL 1

Process Engineer - J. C. Eckert*
Mill Manager - E. Masak, Jr.

Complete Hazardous Wastes Handbook Outline

- I. Introduction
- II. Generator Requirements
 - A. Manifest and Pretransportation Requirements
 - B. Recordkeeping and Reporting
- III. General Facility Standards
 - A. Waste Material Information
 - B. Waste Handling Data
 - C. Security
 - D. Facility Inspection Records
 - E. Records
 - 1. Job Descriptions
 - 2. Training Records
 - F. Ignitable, reactive or incompatible waste
- IV. Preparedness and Prevention
- V. Contingency Plan
- VI. Manifest System Recordkeeping and Reporting
 - A. Mainifest Copies
 - B. Operating Record
 - C. Annual Report
- VII. Closure Plan

* Training Director

VIII. Financial Requirements

IX. Special Cases

A. Groundwater

B. Use and Management of Containers

C. Tanks

D. Surface Impoundments

E. Waste Piles

F. Chemical, Physical and Biological Treatment

X. Notifications

IX. Permit Application

XII. Appendix

A. Facility Map

B. RCRA Regulatory Information

C. DOT Regulatory Information

D. Samples and Sampling Procedures

FIGURE 9

TRAINING LEVEL 2

Operations Manager - R. Hodges
Operations Superintendent - R. Neubauer
Shiftleader - A. Neumann
Shiftleader - A. Schuette
Shiftleader - D. Tanguay
Shiftleader - R. Vanevenhoven

- I. Introduction
- II. Facility Process Description
- III. Emergency Procedures and Contingency Plan
- IV. Plus Level 3 Items

TRAINING - LEVEL 3

Warehouse Materials Coordinator - R. G. Larsen
Dispatcher/Receiver - P. Bergner
Dispatcher/Receiver - D. Smith
Dispatcher/Receiver - M. Nabbefeldt

- I. Introduction
- II. Specific Waste Handling Instructions
- III. Emergency Procedures

Training Director

The personnel training program is directed by John C. Eckert, a Development Facility North Process Engineer. Mr. Eckert has been with Kimberly-Clark Corporation for 17 years and the Development Facility North for two years in conjunction with his responsibilities at Kimberly-Clark Atlas Mill. He received a B.S. degree in Chemistry in 1966. He has been trained in all aspects of Hazardous Waste Management relating to generating and storage facilities. He has attended various seminars and workshops on the subject. Records of such training are contained in the Development Facility North Hazardous Waste Handbook.

Relevance of Training to Job Position

Mr. John C. Eckert, a Development Facility North Process Engineer, is responsible for teaching Hazardous Waste Management Procedures and Contingency Plan implementation to all waste handling personnel. A tiered training program is used to include material relevant to level of responsibility and duties.

Training for Emergency Response

The director of the training program and all current waste-handling personnel have been fully trained at the time of this submittal. In the future all new personnel will complete this training program within six months of assignment to the hazardous waste storage facility or within six months of their date of employment, whichever is later.

Implementation of Training Program

No untrained employee will work in the hazardous waste facility without direct supervision or without completion of the training program.

Employees are required to meet annually for review and update of this training program. The following is covered at such meetings:

- All hazardous wastes currently being handled at the facility. Changes in waste type, source, volume are noted.
- Status of storage and operating conditions. Potential problems and solutions are discussed with employee participating in developing effective solutions.
- Requirements contained in the facility's RCRA permit.
- Changes in RCRA permit status if applicable.
- Incidents requiring implementation of Contingency Plan and/or emergency actions. Prevention of failure of procedures is the key here.

The Quarterly Reports to the Wisconsin Department of Natural Resources and annual reports to EPA will be used as a working document for the review.

Records documenting the job title for each position, job descriptions, names of employees, and complete training programs will be kept onsite in the Process Engineer's files and mill personnel files. These records will be kept until closure of the facility for current employees and for three years from the date of the individual employee's termination for former employees.

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ATTACHMENT 4

CONTINGENCY PLAN

G. CONTINGENCY PLAN

HAZARDOUS WASTE
SPILL PREVENTION CONTROL 7 COUNTERMEASURE PLAN

1. Name and address of operator:

Name Kimberly-Clark Corporation
 Development Facility North
Address 1111 South Henry Street
 Neenah, Wisconsin 54956

2. Type of facility: Generator and Storage

3. Potential Spills - Prediction and Control:

Description of Wastes

<u>Chemical Names</u>	<u>Trade Names</u>	<u>Major Type of Failure</u>	<u>Total Quantity</u>	<u>Hazardous Waste EPA Numbers</u>	<u>Direction of Flow</u>	<u>Secondary Containment</u>
A.Diethyl benzene	Dowtherm J	Drum rupture or spill	55 gallon units	DO01	To floor drains	Concrete catch tank of 500 gallon capacity
B.1,1,1 Trichloro-ethane	Kemthane	Drum rupture or spill	55 gallon units	FO01	To floor drains	Concrete catch tank of 500 gallon capacity
C.Methanol	Methanol	Drum rupture or spill	55 gallon units	DO01	To floor drains	Concrete catch tank of 500 gallon capacity
D.Isopropyl Alcohol, Mineral Spirits (Flammable Liquid NOS)	Isopropyl Alcohol, Paint Thinner	Drum rupture or spill	55 gallon units	DO01	To floor drains	Concrete catch tank of 500 gallon capacity

4. Method of Storage

- a. Describe barrels used for storage: Reuse original shipment containers for waste storage.
- b. Describe secondary containment design, construction materials, and volume: Dowtherm J leaks would drain to a portland cement tank of 500 gallon capacity. Methanol leaks would drain to a portland cement tank of 500 gallon capacity.
- c. Describe barrel inspection methods, procedures, and recordkeeping: Drums are inspected visually for leaks on a weekly basis. **
Records are kept in the Process Engineer's office.
- d. Describe procedure for filling and emptying barrels: Small containers funneled into 55 gallon barrels. Barrels are emptied with a hand pump.
- e. How is spill prevention and control accomplished when filling or emptying barrels? Personnel are instructed on spill prevention *** and location of sorbent materials.
- f. Describe spill prevention and control measures for wastes contained in barrels: See item 2.
- g. Before any emergency equipment is placed in the facility for potential use, it is properly tested for readiness. Also routine inspections of these items are conducted and records maintained.

** All work done in area 4 (Flammable storage shed) is by 2 or more people at all times.

*** Weekly inspection log attached.

5. Facility Drainage

- a. Drainage from diked storage areas is controlled as follows (include operating description of valves, pumps, ejectors, etc.

Area 1 (Kemthane) drainage is accomplished via a drain to a portland cement tank of 500 gallons.

Area 4 (Methanol) drainage is accomplished via a drain to a portland cement tank of 500 gallons. Waste collected in these catch tanks is hand pumped to 55 gallon drums under the supervision of the Process Engineer.

- b. Drainage from undiked areas is controlled as follows (include description of ponds, lagoon or catchment basins and methods of retaining and returning waste to facility): N/A.
- c. The procedure for supervising the drainage of rain water from secondary containment into a storm drain or an open watercourse is as follows (include description of (a) inspection for pollutants, and (b) method of valving security).

Should water run-off enter the catch tanks, the Process Engineer will determine whether there are hazardous chemicals present.

The determination will be based on presence of odor (Dowtherm J, Kemthane and Methanol have very distinctive odors which are readily detectable) and/or presence of a sheen (Dowtherm J has characteristics like oil and will float).

If no odor and/or sheen is present, the water will be pumped to the sanitary sewer. If an odor and/or sheen is present "A" above applies.

How MANY YEARS?

Since I have been RCRA coordinator, no rainwater has been pumped out of the catch tanks. If there is a need in the future, this material will be analyzed by GC/MS to determine its RCRA hazardous waste classification.

6. Written Commitment of Manpower, Equipment, and Materials.

This facility will commit manpower, equipment and materials necessary to clean up any hazardous waste spills and for proper disposal fo hazardous waste material.

7.*Emergency Response Contacts

Contacts	Plan Submittal Date	Arrangements
Fire Department	1/25/85	<ul style="list-style-type: none"> - This department has primary emergency authority - Information will be supplied by the emergency coordinator - The emergency coordinator will be advised of actions taken
Police Department	1/25/85	<ul style="list-style-type: none"> - This department will work with the Fire Department and Facility Coordinator
Theda Clark Hospital	1/25/85	<ul style="list-style-type: none"> - This department will work with the Fire Department and Facility Coordinator

8. Emergency Coordinators

Name (in order of responsibility)	Address	Telephone Home	Business
A. E. Masak, Jr.	1816 E. Park Ridge Ave., App.	731-7800	721-2937
B. John C. Eckert	1523 S. Lee St., Appleton	731-0308	721-2862
C. Robert Hodges	1023 Surrey Ct., Neenah	725-0348	721-2931

9. Emergency Equipment

Description	Location	Capability
See attached fire plan for fire extinguishers.		
Fire alarm	Entire plant	Audible signal
Automatic sprinkler system	Overhead in entire plant	Unlimited city water
Cal-Flor-Dry	Small Stores	300%

- * Call Division of Emergency Government
- Neenah, Wisconsin - 414-725-6321
- Madison, Wisconsin - 608-266-3232

10. Facility Evacuation Plan

A. Signal:

- Automatic fire alarm
- If any fire is not immediately extinguished by a fire extinguisher, the Neenah fire department will be summoned.

B. Evacuation Routes:
(and alternates)

All exits posted, all people exit to street side of mill parking lot area on west-north side.

C. Method of Communicating Plan to Employees:

Posted safety and new employee indoctrination.

D. Dates of Communication of Applicable:

Done on an individual basis:

New hires are indoctrinated when employment begins and all employees are refreshed during scheduled fire drills.

Items 9 and 10 are covered in the Operations Superintendent's files. Relevant items are communicated to all employees.

11. Emergency Coordinator Responsibilities

All emergency coordinators will read this plan and sign their names and titles at the conclusion indicating understanding this plan.

- A. At all times at least one employee is either at the facility or on call with the responsibility for coordinating all emergency response measures.
- B. All emergency coordinators are thoroughly familiar with:
 - 1. All aspects of the facility's contingency plan.
 - 2. All operations and activities at the facility.
 - 3. The location and characteristics of waste handled.
 - 4. The location of all records within the facility.
 - 5. The facility layout.
- C. The emergency coordinator has the authority to commit the resources needed to carry out the contingency plan.

12. Emergency Procedures

- A. Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) immediately:
 - 1. Activates internal facility alarms or communications systems which will notify ALL personnel.
 - 2.* Notifies appropriate state or local agencies with designated response roles if their help is needed.
- B. Whenever an emergency situation would occur, the emergency coordinator will immediately identify the character exact source, amount and a real extent of any released materials.
- C. The emergency coordinator is able to assess possible hazards to human health and the environment that an emergency situation might cause.

- * Call Division of Emergency Government:
 - Neenah, Wisconsin - 414-725-6321
 - Madison, Wisconsin - 608-266-3232

- ** Emergency situation is defined as a spill outside the designated generation, transportation and storage areas (see map on page 10a1), a fire or a situation where employee health or safety may be endangered.

- D. The emergency coordinator reports an emergency situation which could threaten human health or the environment as follows:
 - 1. He immediately notifies local authorities to evacuate local area, if necessary.
 - 2. He immediately notifies either the government official designated as the on-scene coordinator for that area or the National Response Center. He will be knowledgeable to report:
 - a. Name and telephone number of reporter.
 - b. Name and address of facility.
 - c. Time and type of incident.
 - d. Name and quantity of materials involved, to the extent known.
 - e. The extent of injuries
 - f. The possible hazards to human health, or the environment, outside the facility.
- E. The emergency coordinator will take all reasonable measures to ensure that fires, explosions and releases do not occur, recur, or spread to other parts of the facility once an initial incident has occurred.
- F. The emergency coordinator will use the necessary equipment and manpower to monitor for leaks, pressure buildup, gas generation or equipment ruptures, where these occurrences are possible.
- G. The emergency coordinator will provide facilities for treating, storing or disposing of resultant waste material that could result from an emergency occurrence.

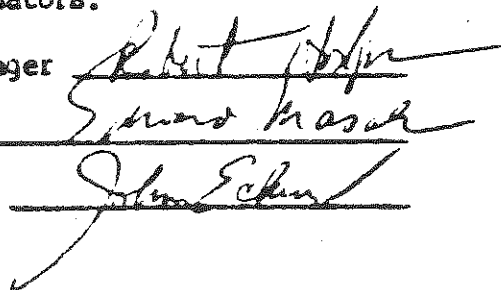
- H. The emergency coordinator is adequately trained to ensure that, in the affected area(s) of the facility:
1. No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are complete.
 2. All emergency equipment used in the contingency plan is cleaned and fit for its intended use before operations are resumed. Any equipment during implementation of the contingency plan will be certified as clean and fit for its intended use by appropriate maintenance professionals and fire-fighting authorities. Dated and signed records of this certification will be maintained.
- I. The Regional Administrator, and appropriate state and local authorities, will be notified that the facility is in compliance with items listed in H. above, before resuming operation in the affected area(s) of an emergency.
- J. The facility will report to one Regional Administrator, the following information within 15 days of an emergency incident and a copy will be retained in appendix IVB.
1. Name, address and telephone number of the owner or reporter.
 2. Name, address and telephone number of the facility.
 3. Date, time, and type of incident.
 4. Name and quantity of material involved.
 5. The extent of injuries.
 6. An assessment of actual or potential hazards to human health or the environment.
 7. Estimated quantity and disposition of recovered material that resulted from the incident.

K. Signatures of emergency coordinators.

Robert Hodges - Operations Manager

Edward Masak - Mill Manager

John Eckert - Process Engineer

The block contains three handwritten signatures, each written over a horizontal line. The first signature is for Robert Hodges, the second for Edward Masak, and the third for John Eckert. The signatures are in cursive and appear to be in ink.

-19j-

On the following pages (19j1 through 19j3)
is found the Waste Handling Activity for
each type of hazardous waste generated
and stored at the Facility.

13. Waste Handling Activity (for each type of material)

A. Material name Dowtherm J

B. Job positions which are involved in the handling of this material are listed below. Copies of the job descriptions are given in the Job Descriptions section.

1. Maintenance Service Operator Oiler
2. Process Engineer
3. Dispatcher Receiver
4. Warehouse Materials Coordinator

C. The normal handling procedures for this material are listed below:

<u>Emergency Situation</u>	<u>Procedures</u>	<u>Responsible Position (see B)</u>
Spill	1. Contain spill	Anyone
	2. Notify Emergency Coordinator	Anyone
	3. Initiate contingency plan	Emergency Coordinator
Fire	1. Follow fire procedure	Anyone

13. Waste Handling Activity (for each type of material)

- A. Material name Methanol and Flammable liquid nos.
- B. Job positions which are involved in the handling of this material are listed below. Copies of the job descriptions are given in the Job Descriptions section.
1. Lab Supervisor
 2. Process Engineer
 3. Head Dispatcher/Receiver
 4. Warehouse Materials Coordinator
- C. The normal handling procedures for this material are listed below:

<u>Procedures</u>	<u>Responsible Position (see B)</u>
Places used Methanol into storage container in waste storage area.	Lab Supervisor
Samples material for analysis	Process Engineer
Removes containers from storage to shipment vehicle under Process Engineer's direction.	Head Dispatcher/Receiver or * Warehouse Coordinator

- D. Possible emergency situations involving the activity are described below with required action by the responsible personnel:

<u>Emergency Situation</u>	<u>Procedures</u>	<u>Responsible Person</u>
Spill	1. Contain spill	Anyone
	2. Notify coordinator	Anyone
	3. Initiate contingency plan	Coordinator
Fire	Follow fire procedure	Anyone

* For Area 4, two people are required in area for all work in storage area (flammable storage shed).

13. Waste Handling Activity (for each type of material)

A. Material name Kemthane, (1,1,1 Tri-chloroethane)

B. Job positions which are involved in the handling of this material are listed below. Copies of the job descriptions are given in the Job Descriptions section.

1. Maintenance Service Operator Oiler
2. Process Engineer
3. Dispatcher Receiver
4. Warehouse Materials Coordinator

C. The normal handling procedures for this material are listed below:

Procedures	Responsible Position (see B)
Transports full collection container to storage area.	Oiler
Samples material for analysis.	Mill Process Engineer
Removes container from storage to shipment vehicle under Mill Process Engineer's direction	Head Dispatcher/Receiver or Warehouse Materials Coordinator

D. Possible emergency situations involving the activity are described below with required action by the responsible personnel:

<u>Emergency Situation</u>	<u>Procedures</u>	<u>Responsible Person</u>
Spill	1. Contain spill	Anyone
	2. Notify coordinator	Anyone
	3. Initiate contingency plan.	Coordinator
Fire	Follow fire procedure	Anyone

REFERENCE SHEET FOR
EMERGENCY ARRANGEMENTS

Date: 12/18/88

Mill Contact: J. C. Eckert

Type of Hazardous Waste Facility: Generator-Storage

Facility Layout: See maps in Part 1, Part 3 of application

Evacuation routes not necessary as mill complex is small, see
19f for procedure.

Other Department Contacted:

Fire Department*
Police Department
Theda Clark Hospital

HAZARDOUS WASTES HANDLED

<u>Wastes</u>				Type of Illness or Injuries Incurred by Contact
<u>EPA Hazardous Waste</u>	<u>Chemical Name</u>	<u>Trade Name</u>	<u>Important Characteristics and/or Properties</u>	
D001	Diethyl benzene Isopropyl alcohol Aliphatic hydro- carbons Methanol Mineral spirits	Waste heat transfer agent Waste solvents	ignitable	burns
F001	1,1,1 trichloroethane	Degreaser	toxic	asphyxiation

*The department with primary responsibility is noted.

14. Amendment of Contingency Plan this plan will be revised when:

- A. Applicable regulations were revised. _____
- B. The plan failed in an emergency. _____
- C. The facility changed in some manner to necessitate a change in the plan. _____
- D. The list of emergency coordinators changed. _____
- E. The list of emergency equipment changed. _____

15. Copies of Contingency Plan

- A. A copy of the contingency plan is maintained at the facility at these locations.
 - 1. Process Engineer Office
 - 2. Operations Superintendent's Office
- B. Organizations outside this facility which have a copy of the contingency plan are:
 - 1. Fire Department
 - 2. Police Department
 - 3. Theda-Clark Hospital
 - 4. Emergency Government Director Winnebago County Courthouse
- C. Revisions are sent to the above locations when necessary.

Date of Revisions:	<u>11/20/81</u>	Removed Pentanol added Methanol
	<u>2/1/84</u>	Replace Lang with Eckert
	<u>1/22/85</u>	Simplified Emergency Coordinator Notification
	<u>3/6/85</u>	Added 2 person work requirement in Area 4
	<u>4/22/85</u>	Rearranged pages, page numbers only.
	<u>1/1/86</u>	Closed areas 2,3.

16. SPOC Plan, Attachment #1 Spill History

(Complete this form for any reportable spill(s) which has (have) occurred from this facility.

No spills as of 4/22/85

Date:

Volume:

Cause:

Corrective action taken:

Plans for preventing recurrence:

IV. PREPAREDNESS AND PREVENTION (SUBPART C)

A. Required Equipment

This facility is equipped with the following unless none of the hazards posed by the wastes could require a particular kind of equipment.

1. An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to all facility personnel. Describe:

Automatic fire alarm system and verbal.

2. A device such as a telephone or two-way radio capable of summoning assistance (external). Describe:

Yes. A telephone is located approximately 150 feet from any storage area in this facility.

3. Fire control equipment, spill control equipment and decontamination equipment (on-site). Describe:

Sprinkler system, portable fire fighting equipment, all of which is adequately marked. For details see 19n1 through 19n8.

4. Water at adequate volume and pressure to supply water hose streams, or foam producing equipment or automatic sprinklers or water spray systems. Describe system:

Sprinkler system inspected with facility personnel and Factory Mutual Insurance records available in mill office.

B. Testing and Maintenance of Equipment

All facility equipment named above is tested and maintained as required to perform correctly. (See Inspection Requirements section - F.2) Maintained in Engineering files.

C. Access to Communications or Alarm Systems

1. Whenever hazardous waste is being poured, mixed, spread or handled, all personnel have immediate access to equipment mentioned above in A.1. unless the nature of the waste does not warrant it.
2. If there is ever just one employee on the premises during operation, he has immediate access to the equipment listed above in A.2. unless the nature of the waste does not warrant it. Two people will always be present when working in area 4.

Items in C above are enforced.

FIRE ALARM PROCEDURE

1. The Shiftleader will call the fire department as soon as the alarm is sounded. Under no circumstances will the fire department be called off.
2. Shiftleader designates and trains a valve man.
3. Converting Machine Tender makes sure the gates are unlocked and directs the fire department to the fire.
4. All remaining Machine Tenders will report to the Shiftleader for fire fighting duties. The Shiftleader will supervise the fire fighting in the Fire Chief's absence.
5. One material handler will report to the Shiftleader for phone support on all shifts.

When the alarm is sounded the following people will evacuate the building except if a member of the fire brigade:

All maintenance personnel.

All warehouse personnel.

All office personnel except receptionist who will remain near her phone for further communications with police, fire department, T.C.C. security guard.

All Bay 5 - Sheeter people

Bay 1 and Bay 2 will shut down and evacuate.

All other Bays will continue to operate unless fire is in your area; then shut the machine down and evacuate.

Follow up:

Call Fire Chief, Assistant or Jim Rymer to report the incident.

1. Make sure pull box is reset.
 2. Kimtech main control board is reset.
 3. All spent extinguishers are recharged and replaced.
- Valley Fire Protection 24 hour number - 731-1344
 - On B & C Shift and weekend, T.C.C. is to be called to supply information - Extension 2156.

EMERGENCY EQUIPMENT

In the event of a fire, the Development Facility has an overhead water sprinkler system which is connected to the city water supply and which is automatically triggered by temperature sensing devices at each sprinkler shower head.

The Development Facility has an audible fire alarm system which is manually activated by pulling a fire alarm switch or automatically activated by a pressure drop in the overhead sprinkler system. The Neenah Fire Department automatically responds to these alarms.

There are 113 fire extinguishers located throughout the Development Facility. See attached listing for location and capability of each.

WASTE METHANE STORAGE - AREA 1

Emergency protection consists of:

1. An overhead automatic water sprinkler system which is supplied by city water (virtually unlimited supply capacity).
2. A dry chemical fire extinguisher (91) of 30 pound capacity located at the entrance to the area. Also, a carbon dioxide extinguisher (90) of 10 pound capacity located 30 feet from the entrance to the area.
3. Continuous exhaust ventilation of 650 cubic feet per minute at the floor in this area.
4. Leak drainage to a cement catch tank (CT1) of 500 gallon capacity.

ALCOHOL STORAGE SHED - AREA 4

Emergency protection consists of:

1. Barrel grounding for when removing alcohol from 55 gallon drums.
2. Continuous operation ventilation fan for fume exhaust from alcohol storage shed.
3. Explosion proof storage shed.
4. Leak drainage to a cement catch tank (CT3) of 500 gallon capacity.
5. A dry chemical fire extinguisher (114) of 30 pound capacity located in the storage shed.
6. Two people will be present at all times during operations in the storage shed.

FIRE EXTINGUISHER LISTING

<u>NUMBER</u>	<u>LOCATION</u>	<u>TYPE</u>	<u>CAPACITY</u>	<u>EFFECTIVE DISCHARGE TIME</u>
1.	North Warehouse SW corner	Dry A20E	20 lbs.	20 sec.
2.	North Warehouse NW corner	Dry A20E	20 lbs.	20 sec.
3.	North Warehouse NE corner	Dry A20E	20 lbs.	20 sec.
4.	North Warehouse S end	Dry A30E	30 lbs.	25 sec.
5.	Bay 5 NW corner	CO ₂	15 lbs.	22 sec.
6.	Bay 5 W middle	Dry A20E	20 lbs.	20 sec.
7.	Northwest Warehouse E middle	Dry A20E	20 lbs.	20 sec.
8.	Northwest Warehouse N middle	CO ₂	15 lbs.	22 sec.
9.	Northwest Warehouse W	Dry A20E	20 lbs.	20 sec.
10.	Bay 2A SW	Dry A20E	20 lbs.	20 sec.
11.	Bay 2A E	Dry A20E	20 lbs.	20 sec.
12.	Bay 2A W	Dry A20E	20 lbs.	20 sec.
13.	Bay 2A Mezzanine	Dry A20E	20 lbs.	20 sec.
14.	Bay 2A Mezzanine	CO ₂	10 lbs.	22 sec.
15.	Northwest Warehouse center	Dry A20E	20 lbs.	20 sec.
16.	Shop	Dry A20E	20 lbs.	20 sec.
17.	Shop	CO ₂	10 lbs.	22 sec.
18.	Trim room	Dry A10E	10 lbs.	15 sec.
19.	Tractor isle (outside trim room)	CO ₂	10 lbs.	22 sec.
20.	Sheet N	Dry A20E	20 lbs.	20 sec.
21.	Sheeter E	Dry A10E	10 lbs.	15 sec.
22.	Bay 1 NW	Dry A20E	20 lbs.	20 sec.
23.	Bay 1 NW	Dry A20E	20 lbs.	20 sec.

<u>NUMBER</u>	<u>LOCATION</u>	<u>TYPE</u>	<u>CAPACITY</u>	<u>EFFECTIVE DISCHARGE TIME</u>
24.	Bay 1 E	Dry A20E	20 lbs.	20 sec.
25.	Bay 1 E	CO ₂	10 lbs.	22 sec.
26.	Bay 1 S	Dry A30E	30 lbs.	25 sec.
27.	Bay 1 S center	Dry A20E	20 lbs.	20 sec.
28.	Bay 1 S center	Dry A30E	30 lbs.	25 sec.
29.	Bay 1 S center	Dry A10E	10 lbs.	15 sec.
30.	Bay 1 S center	Dry A20E	20 lbs.	20 sec.
31.	Bay 1 S center	Dry A30E	30 lbs.	25 sec.
32.	Bay 1 S center	Dry A20E	20 lbs.	20 sec.
33.	Bay 1 center	CO ₂	10 lbs.	22 sec.
34.	Bay 1 center	CO ₂	10 lbs.	22 sec.
35.	Bay 1 center	CO ₂	10 lbs.	22 sec.
36.	Bay 1 center	CO ₂	10 lbs.	22 sec.
37.	Bay 1 center	CO ₂	15 lbs.	22 sec.
38.	Bay 1 center	CO ₂	20 lbs.	22 sec.
39.	Bay 2 SE	Dry A20E	20 lbs.	20 sec.
40.	Bay 2 Treatment mezzanine	CO ₂	15 lbs.	22 sec.
41.	Bay 2 E	Dry A20E	20 lbs.	20 sec.
42.	Bay 2 S center	Dry A10E	10 lbs.	15 sec.
43.	Bay 2 SW	Dry A20E	20 lbs.	20 sec.
44.	Bay 2 center	Dry A10E	10 lbs.	15 sec.
45.	Bay 2 center	Dry A20E	20 lbs.	20 sec.
46.	Bay 2 N	Dry A20E	20 lbs.	20 sec.
47.	Bay 2 Mezzanine S	Dry A20E	20 lbs.	20 sec.
48.	Bay 2 Mezzanine S	Dry A20E	20 lbs.	20 sec.

<u>NUMBER</u>	<u>LOCATION</u>	<u>TYPE</u>	<u>CAPACITY</u>	<u>EFFECTIVE DISCHARGE TIME</u>
49.	Bay 2 Mezzanine W	Dry A20E	20 lbs.	20 sec.
50.	Bay 2 Mezzanine NW	Dry A20E	20 lbs.	20 sec.
51.	Bay 2 Mezzanine N	Dry A20E	20 lbs.	20 sec.
52.	Bay 5 Mezzanine over trim room	Dry A20E	20 lbs.	20 sec.
53.	Bay 3 N	Dry A30E	30 lbs.	25 sec.
54.	Bay 3 NE	Dry A20E	20 lbs.	20 sec.
55.	Bay 3 NE	CO ₂	10 lbs.	22 sec.
56.	Bay 3 E	Dry A30E	30 lbs.	25 sec.
57.	Bay 3 E	Dry A30E	30 lbs.	25 sec.
58.	Bay 3 Mezzanine E	Dry A20E	20 lbs.	20 sec.
59.	Bay 3 Mezzanine N	Dry A30E	30 lbs.	25 sec.
60.	Bay 3 Mezzanine N	Dry A20E	20 lbs.	20 sec.
61.	Bay 3 Mezzanine S	Dry A30E	30 lbs.	25 sec.
62.	Bay 3 SE	CO ₂	10 lbs.	22 sec.
63.	Bay 6 NE	Dry A30E	30 lbs.	25 sec.
64.	Bay 6 E	CO ₂	15 lbs.	22 sec.
65.	Bay 6 SE	Dry A20E	20 lbs.	20 sec.
66.	Bay 6 SE	CO ₂	10 lbs.	22 sec.
67.	Bay 6 SW	Dry A20E	20 lbs.	20 sec.
68.	Bay 6 SW	Dry A30E	30 lbs.	25 sec.
69.	Bay 6 N	CO ₂	10 lbs.	22 sec.
70.	Bay 6 N	CO ₂	15 lbs.	22 sec.
71.	Bay 6 N	CO ₂	10 lbs.	22 sec.
72.	Bay 6 N	CO ₂	10 lbs.	22 sec.

<u>NUMBER</u>	<u>LOCATION</u>	<u>TYPE</u>	<u>CAPACITY</u>	<u>EFFECTIVE DISCHARGE TIME</u>
73.	Bay 6 NW	Dry A20E	20 lbs.	20 sec.
74.	Bay 6 Mezzanine NE	Dry A20E	20 lbs.	20 sec.
75.	Bay 6 Mezzanine E	Dry A10E	10 lbs.	15 sec.
76.	Bay 6 Mezzanine E	CO ₂	10 lbs.	22 sec.
77.	Bay 6 Mezzanine NW	Dry A20E	20 lbs.	20 sec.
78.	Bay 6 Mezzanine NW	CO ₂	10 lbs.	22 sec.
79.	Bay 6 Mezzanine SW	Dry A20E	20 lbs.	20 sec.
80.	Bay 6 Mezzanine SW	CO ₂	20 lbs.	22 sec.
81.	Bay 6 Tower SW	Dry A20E	20 lbs.	20 sec.
82.	Bay 6 Tower N	Dry A30E	30 lbs.	25 sec.
83.	Bay 4 1st Floor SE	Dry A30E	30 lbs.	25 sec.
84.	Bay 4 1st Floor SW	CO ₂	19 lbs.	22 sec.
85.	Bay 4 1st Floor W	Dry A20E	20 lbs.	20 sec.
86.	Bay 4 1st Floor NW	Dry A20E	20 lbs.	20 sec.
87.	Bay 4 1st Floor NW	Dry A30E	30 lbs.	25 sec.
88.	Bay 4 1st Floor N	Dry A20E	20 lbs.	20 sec.
89.	Bay 4 1st Floor E	Dry A20E	20 lbs.	20 sec.
90.	Bay 4 Compressor Room E	CO ₂	10 lbs.	22 sec.
91.*	Bay 4 A1	Dry A30E	30 lbs.	25 sec.
92.	Bay 4 5th Floor	Dry A30E	30 lbs.	25 sec.
93.	Bay 4 5th Floor	Dry A20E	20 lbs.	20 sec.
94.	Bay 4 5th Floor	CO ₂	10 lbs.	22 sec.
95.	Bay 4 5th Floor	CO ₂	10 lbs.	22 sec.
96.	Bay 4 4th Floor	Dry A20E	20 lbs.	20 sec.

<u>NUMBER</u>	<u>LOCATION</u>	<u>TYPE</u>	<u>CAPACITY</u>	<u>EFFECTIVE DISCHARGE TIME</u>
97.	Bay 4 4th Floor	Dry A20E	20 lbs.	20 sec.
98.	Bay 4 4th Floor	Dry A30E	30 lbs.	25 sec.
99.	Bay 4 3rd Floor	Dry A20E	20 lbs.	20 sec.
100.	Bay 4 3rd Floor	Dry A30E	30 lbs.	25 sec.
101.	Bay 4 2nd Floor	CO ₂	10 lbs.	22 sec.
102.	Bay 4 2nd Floor	CO ₂	10 lbs.	22 sec.
103.	Bay 4 2nd Floor	CO ₂	10 lbs.	22 sec.
104.	Bay 4 2nd Floor	CO ₂	10 lbs.	22 sec.
105.	Bay 4 Elevator	CO ₂	10 lbs.	22 sec.
106.	Office 1st Floor	CO ₂	10 lbs.	22 sec.
107.	Office 1st Floor	Dry A20E	20 lbs.	20 sec.
108.	Office 1st Floor Lab	Dry A20E	20 lbs.	20 sec.
109.	Office 2nd Floor	Dry A5E	5 lbs.	11 sec.
110.	Office 2nd Floor	Dry A30E	30 lbs.	25 sec.
111.	Office 2nd Floor	Dry A20E	20 lbs.	20 sec.
112.	Office 2nd Floor	CO ₂	10 lbs.	22 sec.
113.	Office 2nd Floor	Dry A5E	5 lbs.	11 sec.
114.*	Alcohol Storage Shed	Dry A30E	30 lbs.	25 sec.

* Hazardous Waste Areas

D. Required Aisle Space

Aisle space is maintained to allow unobstructed movement of personnel and equipment unless such aisle space is not needed for them. This is enforced.

E. Arrangements with Local Authorities

1. The following entities (appropriate to the needs of the facility) have been supplied with the facility layout, properties of hazardous waste, places where facility personnel are normally working and entrances and possible evacuation routes. (Sample attached)

Police Department	<u>1/25/85</u>	Date Notified
Fire Department	<u>1/25/85</u>	Date Notified
State Emergency Response Teams	* <u> </u>	Date Notified
Div. of Emergency Government (County)	<u> </u>	Date Notified
Emergency Response Contractors	* <u> </u>	Date Notified
Equipment Suppliers	* <u> </u>	Date Notified <u>AND</u>

2. Local hospitals have been notified of the hazardous waste properties and the types of illnesses or injuries which they could incur.

Theda Clark Hospital	<u>1/25/85</u>	Date Notified
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3. These entities have entered into arrangements with our operation.

* Not applicable for our particular types of wastes.

WID 000808444

ATTACHMENT 5

CLOSURE PLAN

I. DEVELOPMENT FACILITY NORTH CLOSURE PLAN

ITEM I. Facility Conditions

A. General Conditions

1. Facility consists of two storage areas as shown on page 2e. Both areas have an impervious concrete floor and catch basin.

The flammable storage shed is a 15'x20' metal building equipped with a 4" berm, manual fire alarm, exhaust fan, sealed explosion proof lighting and a portable fire extinguisher (area 1). When not in use the shed is secured with a padlock. (Maximum capacity is 25 drums).

Area 4 consists of a 9' by 12' storage area equipped with a drain to a 500 gallon concrete catch basin. This area is equipped with automatic sprinklers, a portable CO₂ fire extinguisher, and access is via secured facility only. (Maximum capacity is 15 drums).

2. 55 gallon drums are the only storage method used. Wastes stored include:

- a. Flammable spent solvents; typically mineral spirits, methanol, isopropanol, non-halogenated hydrocarbon degreasers.
- b. Waste 1, 1, 1 trichloroethane from degreasing, machine cleaning and maintenance operations.
- c. Spent heat transfer agent diethyl benzene which is flammable.

B. Equipment Inventory

All equipment used in the hazardous waste storage areas is from the Development Facility North production equipment list.

Typically a hand cart is used to move drums to, in and from the hazardous waste storage areas.

C. Closure Schedule

At this time, closure is not anticipated, however, discussions with the agency have indicated a need to select an arbitrary closure date. For this reason we have selected the year 2020.

1. Removal of inventory - to be done during first 30 days of closure.
2. Decontamination - All residues present will be removed and treated as a flammable or chlorinated waste as above. All remaining pallets will also be disposed of - all of which will be done during the next 30 days of closure.

ITEM II. Removal of Inventory

- A. All waste that is recyclable will be processed for reuse. Our present contract is Hydrite Chemical Company which utilizes the Hydrite Cottage Grove recycling operation.
- B. No treatment or disposal will occur at this facility.
- C. Consistent with our current operation all drums will be properly labeled, inspected and manifested for shipment to a permitted disposal or recycle facility.

ITEM III. Facility Decontamination

A. Structure

The floor of the storage areas will be scrubbed and all residue placed in a barrel and treated as contaminated waste. Hand tools and a mill floor scrubber will be used.

B. Equipment

All equipment used to decontaminate the structure will be cleaned by detergent and treated as contaminated waste. Steam, detergent and/or water will be used.

- C. Approximately a maximum of one 55 gallon drum of contaminated cleaning material will be generated and disposed of as the above inventory.

- D. All wooden pallets will be disposed of with the above inventory. They will be treated as a fuel source or landfilled.

The Mill Manager will monitor all closure activities to ensure conformance to this plan.

ITEM IV. Post Closure Plan

N/A.

ITEM V. Notice in Deed and Notice to Local Land Authority

N/A.

ITEM VI. Closure Cost Estimate

A. Closure Cost Estimate

1.	<u>Removal of maximum inventory</u>	<u>1985</u>
	100 drums x \$140.11/drum =	<u>\$14011</u>
2.	<u>Decontamination</u>	
a.	<u>Structure</u>	
	10 hours x \$14/hr. x I.F.	<u>145.60</u>
b.	<u>Equipment</u>	
	5 hours x \$14/hr. x I. F.	<u>72.80</u>
c.	<u>Disposal of residue from decontamination</u>	
	1 drum x \$80/drum x I. F.	<u>166.40</u>
d.	<u>Disposal of pallets</u>	<u>50.00</u>
	Subtotal	<u>14445.80</u>
3.	<u>Administrative and Contingency</u>	
a.	Administrative including paperwork associated with activities and 15% of subtotal	<u>2166.87</u>
b.	Contingency 15% of subtotal	<u>2166.87</u>
	Total	<u>18779.54</u>

*Costs reflect updating by Inflation Factor (I.F.) for 1985.

Example 100 drums x \$134.72/drum x 1.04 = \$14011 (I.F. for 1985)

ITEM VII Financial Assurance Mechanism for Closure

The Development Facility North has secured a bond for the Hazardous Waste storage facility as required by Wis. NR181. A 19225 bond from Safeco Insurance Company of America covers the period from November 25 1984, through November 25, 1985. A copy of the bond is attached.

In addition, the federal Environmental Protection Agency's (EPA) financial test demonstrating adequate coverage for closure costs and liability insurance was completed and submitted. This document is attached.

ITEM VIII. Post Closure Cost Estimate

Since all wastes will be disposed of offsite, there will be no post-closure activities or costs.

ITEM IX. Financial Assurance Mechanism for Post Closure

Since all wastes will be disposed of offsite, there will be no post-closure activities or costs.

ITEM X. Liability Insurance

- A. Sudden Insurance is covered by the financial test.
- B. Non-Sudden Insurance is not required as we are not involved with waste treatment or disposal on-site.
- C. Financial Test - The most recent financial test prepared by the Corporation is attached.
- D. Variance Procedures - N/A.

ITEM XI. Adjustment Procedures - N/A

JOHNSON & HIGGINS

OF ILLINOIS, INC.

Business Established, New York 1845

**INSURANCE BROKERS-AVERAGE ADJUSTERS
ACTUARIES-EMPLOYEE BENEFIT PLAN CONSULTANTS**

NOV 13 1984

101 NO. WACKER DRIVE, CHICAGO ILL. 60606
TEL. 263-2456 AREA CODE 312

November 9, 1984

Ms. Priscilla Darling
Risk Management Department
Kimberly-Clark Corporation
401 N. Lake Street
Neenah, Wisconsin 54956

Bonds No. 909787 909784

Dear Priscilla:

Pursuant to your request of October 25, enclosed please note the two surety riders for the above captioned bonds which increase penalties as requested. Kindly see that the enclosures are properly signed and sealed prior to filing with the State of Wisconsin.

Our additional premium invoices for the increase plus the 1984 to 1987 renewal premiums will be forthcoming in a few days. Please feel free to call me if you have any questions regarding this matter.

Cordially,

Terri Erickson
Terri Erickson
Casualty Department

TE/db5
Enclosures

Boston 4, 1984
A. G. Brown
B. G. Brown
C. G. Brown
D. G. Brown
E. G. Brown
F. G. Brown
G. G. Brown
H. G. Brown
I. G. Brown
J. G. Brown
K. G. Brown
L. G. Brown
M. G. Brown
N. G. Brown
O. G. Brown
P. G. Brown
Q. G. Brown
R. G. Brown
S. G. Brown
T. G. Brown
U. G. Brown
V. G. Brown
W. G. Brown
X. G. Brown
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SURETY RIDER -35b-

SAFECO INSURANCE COMPANY OF AMERICA
GENERAL INSURANCE COMPANY OF AMERICA
FIRST NATIONAL INSURANCE COMPANY
OF AMERICA
HOME OFFICE SAFECO PLAZA
SEATTLE WASHINGTON 98185

To be attached to and form a part of

Type of Bond Hazardous Waste Storage BondBond No 909784dated effective 11/25/81

(MONTH DAY YEAR)

executed by Kimberly-Clark Corporation

(PRINCIPAL)

as Principal

and by Safeco Insurance Company of America

(SURETY)

as Surety

in favor of State of WI Dept of Natural Resources

(OBLIGEE)

In consideration of the mutual agreements herein contained the Principal and the Surety hereby consent to changing

the bond penaltyFrom \$18,486.00To \$19,225.00

Nothing herein contained shall vary, alter or extend any provision or condition of this bond except as herein expressly stated

This rider is effective 11/25/84

(MONTH DAY YEAR)

Signed and Sealed 11/7/84

(MONTH DAY YEAR)

By Kimberly-Clark CorporationBy Garry Hanley

PRINCIPAL

Kelli Hg.

TITLE

Safeco Insurance Company of America

SURETY

By Alice Albano

Alice Albano

ATTORNEY-IN-FACT

March 21, 1985

Environmental Protection Agency
Waste Management Branch
230 S. Dearborn Street
Chicago, Illinois 60604

I am the Chief Financial Officer of Kimberly-Clark Corporation, Neenah, Wisconsin 54956. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265: See Attachment I - Atlas Mill and Development Facility North.

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: See Attachment I - Atlas Mill and Development Facility North.
2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.
3. In States where the EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified

in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: See Attachment I. Other facilities are covered under parallel regulations developed by their respective state and/or federal regulatory agencies.

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1984.

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

By:



Donald R. Hibbert
Vice Chairman of the Board, Treasurer and
Chief Financial Officer

March 21, 1985

ATTACHMENT I

Part A. Facility Closure Cost Estimates⁽¹⁾

<u>Facility⁽²⁾ and Address</u>	<u>U.S. \$000</u> <u>EPA I.D. No.</u>	<u>Current Closure⁽³⁾</u> <u>Cost Estimate</u>
EPA Region 1:		
New Milford Mill	CTD 001453299	\$11
58 Pickett Dist. Rd.		
New Milford, CT 06776	Subtotal	<u>\$11</u>
EPA Region 4:		
Corinth Mills	MST 000623017	\$12
Kendrick Rd., Rt. 8		
Corinth, MS	Subtotal	<u>\$12</u>
EPA Region 5:		
Brown-Bridge - Plant 1	OHD 088648282	\$16
518 E. Water Street		
Troy, OH 45373		
Brown-Bridge - Plant 2	OHD 980569263	\$ 3
Marybill Drive		
Troy, OH 45373		
Atlas Mill	WID 006125959	\$53
425 W. Water St.		
P. O. Box 115		
Appleton, WI 54911		
Development Facility North	WID 000808444	\$18
1111 Henry St.		
Neenah, WI 54956		
	Subtotal	<u>\$90</u>
	Grand Total	<u>\$113</u>

(1) All facilities are located in states which maintain their own RCRA program. Connecticut and Mississippi have full Phase II authorization and Wisconsin and Ohio have Phase I.

(2) All of the above listed facilities are manufacturing locations which operate hazardous waste storage facilities.

(3) Post-closure costs are not applicable.

Attachment I

Page 2

Part B. Closure or Post-Closure Care and Liability Coverage

Alternative 1

U.S. \$000

1. Sum of current closure and post-closure cost estimates	
Current closure	\$ 113
Post-closure	-
	<u>113</u>
2. Amount of annual aggregate liability coverage to be demonstrated	<u>2,000</u>
3. Sum of lines 1 and 2	\$ <u>2,113</u>
4. Total liabilities	
Total liabilities	\$1,600,400*
Less: Any portion of closure or post-closure cost estimates included in the "total liabilities" line	-
	<u>\$1,600,400</u>
5. Tangible net worth	
Stockholders' equity	\$1,572,236*
Less: Intangible assets	(20,261)
Tangible net worth	<u>\$1,551,975</u>
6. Net worth (stockholders' equity)	<u>\$1,572,236*</u>
7. Current assets	<u>\$ 918,478*</u>
8. Current liabilities	<u>\$ 701,812*</u>
9. Net working capital (line 7 minus line 8)	<u>\$ 216,666*</u>
10. Net income	\$ 224,980*
Plus: Depreciation.	125,257*
	<u>\$ 350,237*</u>
11. Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)	<u>\$1,862,157*</u>

Attachment 1
Page 3

	<u>Yes</u>	<u>No</u>
12. Is line 5 at least \$10 million?	X	
13. Is line 5 at least 6 times line 3?	X	
14. Is line 9 at least 6 times line 3?	X	
15. Are at least 90% of assets located in the U.S.? If not, complete line 16.		X
16. Is line 11 at least 6 times line 3?	X	
17. Is line 4 divided by line 6 less than 2.0?	X	
18. Is line 10 divided by line 4 greater than 0.1?	X	
19. Is line 7 divided by line 8 greater than 1.5?		X

*Figures derived from the consolidated financial statements of Kimberly-Clark Corporation and Subsidiaries for the year ended December 31, 1984.

WID 000 808 444

ATTACHMENT 6

CONTAINER STORAGE

D. PROCESS INFORMATION

Containers

There are two storage locations both of which are totally enclosed:

1. Waste Kemthane Storage Area 1. 1,1,1 TRICHLOROETHANE \equiv KEATHANE
 - a. area - 108 ft² (9 ft x 12 ft)
 - b. capacity - 15 drums (55 gallon) = 825 gallons
2. Alcohol storage shed Area 4 ALL OTHER WASTE TYPES
ARE DODI
 - a. area - 300 ft² (15 ft x 20 ft)
 - b. capacity - 25 drums (55 gallon) = 1375 gallons

Area 1 is protected by the facility's automatic sprinkling system, portable dry chemical extinguishers and the 1.5 inch fire hose system. Area 4 is protected by a dry chemical extinguisher, alarm system and 1-1/2 inch fire hose system. Current facility security is already in existence (see Figure 5). Areas are diked and have catch basins described later in this section.

1. Description of Containers: Steel 55 gallon drums are used at this facility to store the waste listed above under waste characteristics. Drums meet DOT Spec. 17C. As allowed by DOT regulations 49 CFR 173.28 (p).
 - Reuse of packaging (containers), the same drums used for incoming raw materials are reused once for storing and transporting hazardous waste. The guidelines shown on Page 10b are used (49 CFR 173.28) (p).
2. Container management practices: Prior to transfer to container storage area, wastes generated in the processing area are placed in steel drums. Transfer of waste to the container storage area is accomplished by fork lift truck or drum hand cart. At the Development Facility North storage areas, there are no sources of ignition such as an open flame. Smoking is prohibited. Only D.O.T. approved drums are used. Good housekeeping procedures are followed at all times.

The drums may be stacked 8 ft. high (2 drums). Primary aisle space of at least 3 ft. is maintained at all times, and the container storage area is inspected regularly.
3. Secondary Containment System Design and Operation: The entire facility is bounded by an 8 ft. high chain link security fence and the secured process building. The bases of these areas are free of gaps and impervious to the wastes being stored.
4. DOT Regulations: DOT instructions (packaging, labeling, marking, and placarding) are shown on pages 10c - 10k with one example shown.
5. Aisle space: Sufficient aisle space is maintained in the storage areas to allow easy accessibility of any leaking drum(s). See Figs. 5d and 5e.)

6. On-Site Traffic Pattern: Traffic aisles are clearly designated throughout most ~~of~~ major operating areas in the facility. No railroad tracks are crossed at any aisle. Adequate aisle space is always maintained in the storage areas for quick accessibility of any leaking drums (See Figs. 5d and 5e). See page 10a1 for map showing detailed traffic patterns to storage and loading areas.
7. Estimated Traffic Volume: Normal hazardous waste generated is 1-2 55-gallon drums a month. This material is transported to one of the storage areas prior to eventual loading onto a truck for transport to a designated hazardous waste treatment or disposal facility. (14)
8. Scheduling of On-Site Transportation: Hazardous waste is transported during normal operating hours which occur approximately once or twice per month. Proper lighting is required where necessary.
9. Access Road Surfacing and Load Bearing Capacity: All surfaces in the storage areas are concrete. All surfaces within the operating plant are concrete and at grade (no basements). All other areas which would handle vehicle traffic handling hazardous waste, would be either blacktop or compacted gravel. All roads are maintained in good repair. See map on page 10a1.

Both storage areas have concrete bases. The alcohol storage shed (Area 4) is bermed and has a cement catch basin which will yield a spill containment capacity of 500 gallons. The Kenthane storage area 1 is bermed and has a cement catch tank which yields a spill containment capacity of 500 gallons. The slope of the storage area is directed towards the draw, thereby minimizing accumulation of waste material around the bases of the hazardous waste storage drums for area 1. Area 2 drums are stored on pallets in addition to having the floor sloped towards one draw. Both draws lead to catch tanks as described above.

Liquids accumulating in each of the storage containment areas or the catch tanks will be properly classified as hazardous or non-hazardous waste (per 40 CFR 261) and pumped into appropriate containers and disposed of according to procedures described in this plan. When necessary, rags may be used to clean the storage area floor. The rags would then be disposed of as a hazardous waste if appropriate.

During non-operation hours mill security personnel make hourly tours of the area.

Refer to Figures 5b, 5c, 5d and 5e, for secondary containment descriptions and aisle space configurations. The bases are free of cracks or gaps and are impervious to the wastes being stored. Inspection of structural integrity of base (secondary containment system) has been added to inspection log.

Fire Control Facilities: An elaborate network of CO₂ extinguishers, dry chemical extinguishers and 1-1/2" fire hose water systems exist throughout Development Facility North. Development Facility North Fire Procedure Manual is available upon request from the Facility. Refer to the Contingency Plan for fire fighting equipment details.

Flood Control Drainage Barriers: An elaborate system of locks and dams controls this portion of the Fox River. See Figure 2.

3. Location Information

a. Seismic Standard

1. Facility Location Information. The facility is not in an area where the seismic standard applies. It is located in Winnebago County, Wisconsin which is not listed in 40 CFR Part 264 Appendix VI; therefore, it complies.

b. Flood Plain Standard

Facility exists outside 100 year flood plain level.

4. Traffic Patterns

Access to Development Facility North is off Henry Street. One internal road exists in the facility. Employees and truck shippers enter the mill on the east side at the controlled employee/visitor entrance and loading dock respectively. Visitors sign in and out, and are issued a visitor badge and are accompanied at all times by mill personnel. See map on page 10a1 for traffic pattern to storage area and from storage areas to loading dock.]

Railroad access to the mill is accomplished via a spur of the Chicago and Northwestern Railroad. It is located along the southeast side of the Facility. A security gate must be opened by authorized personnel to use this spur.

Traffic Control Signals: N/A.

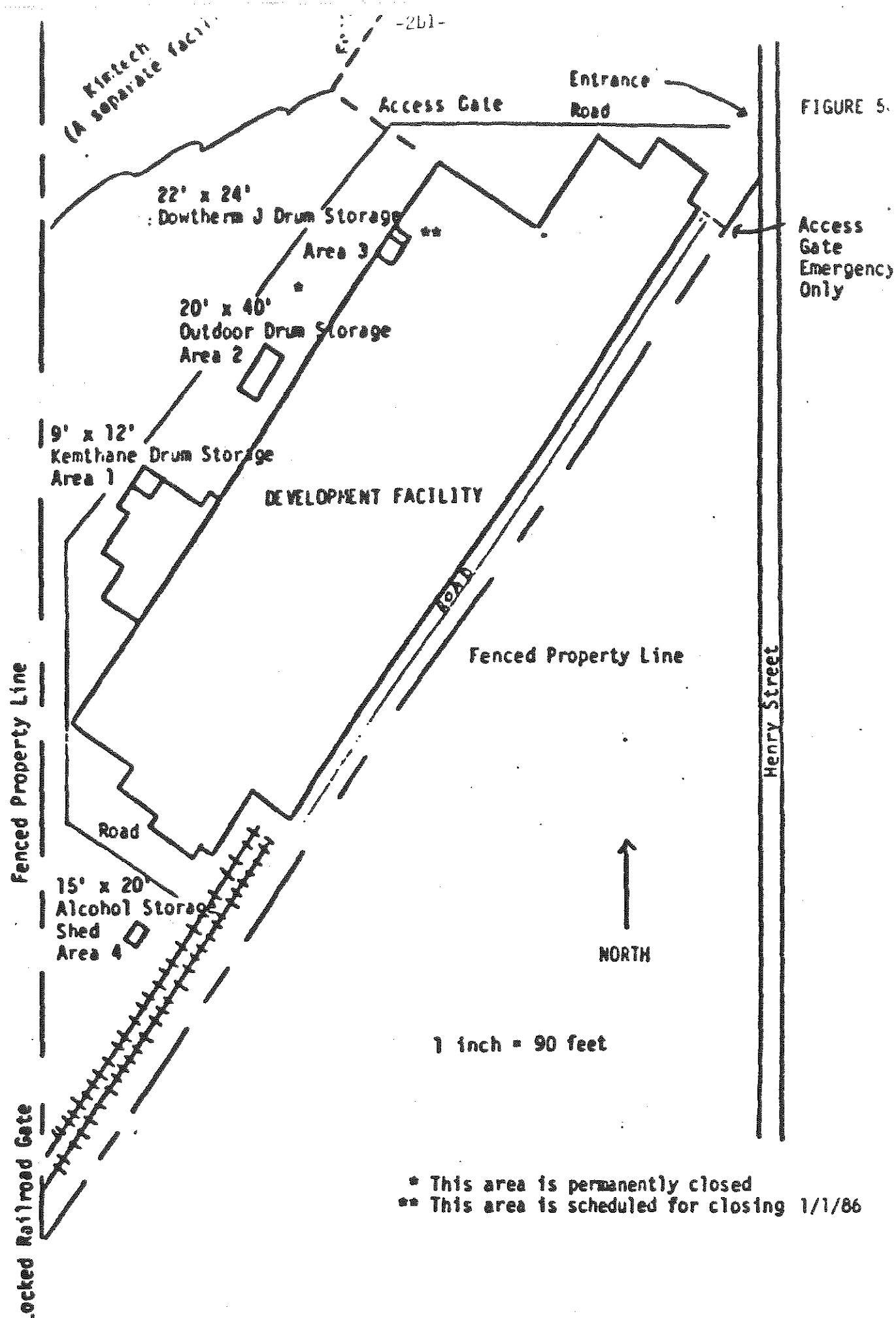
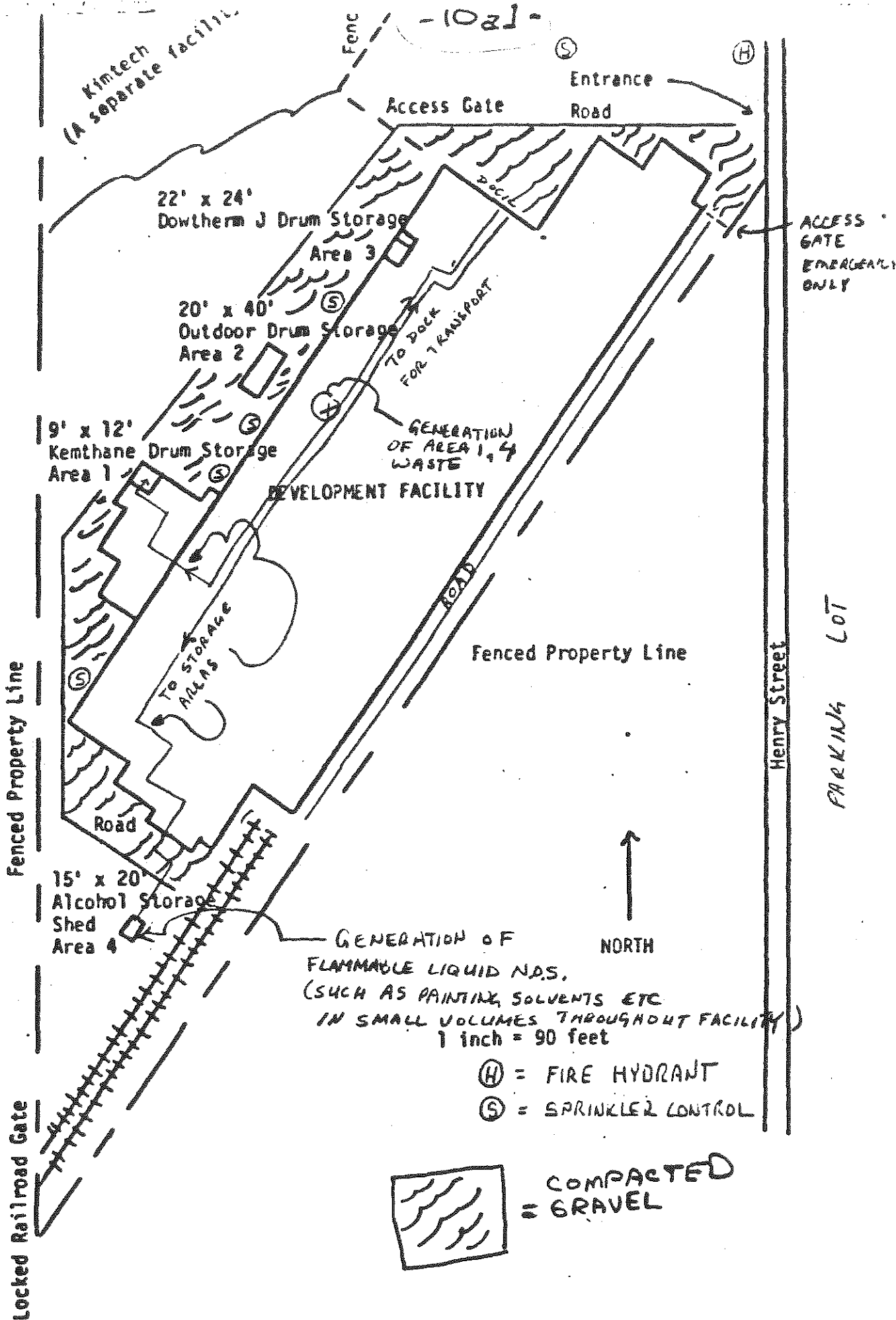
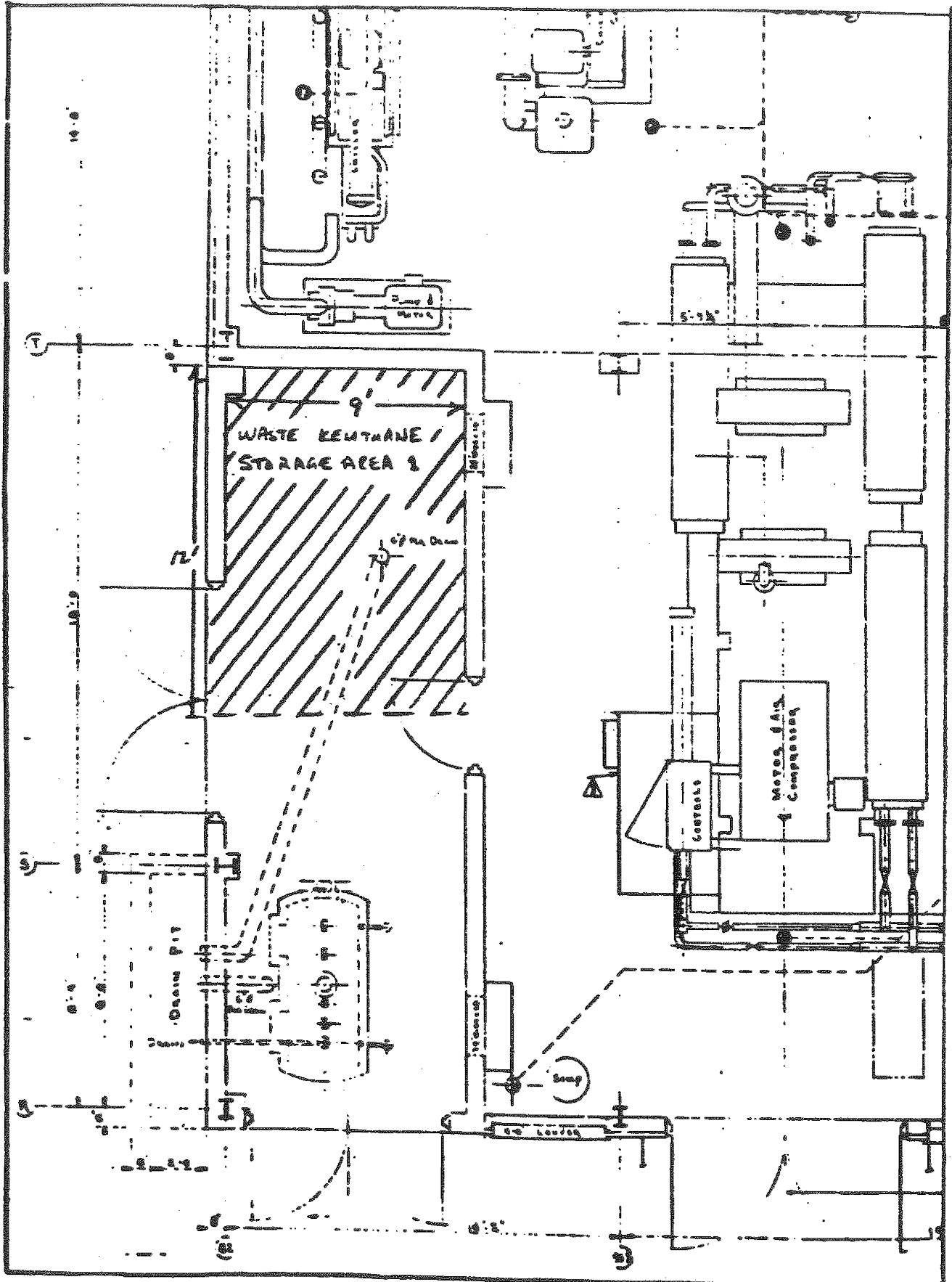
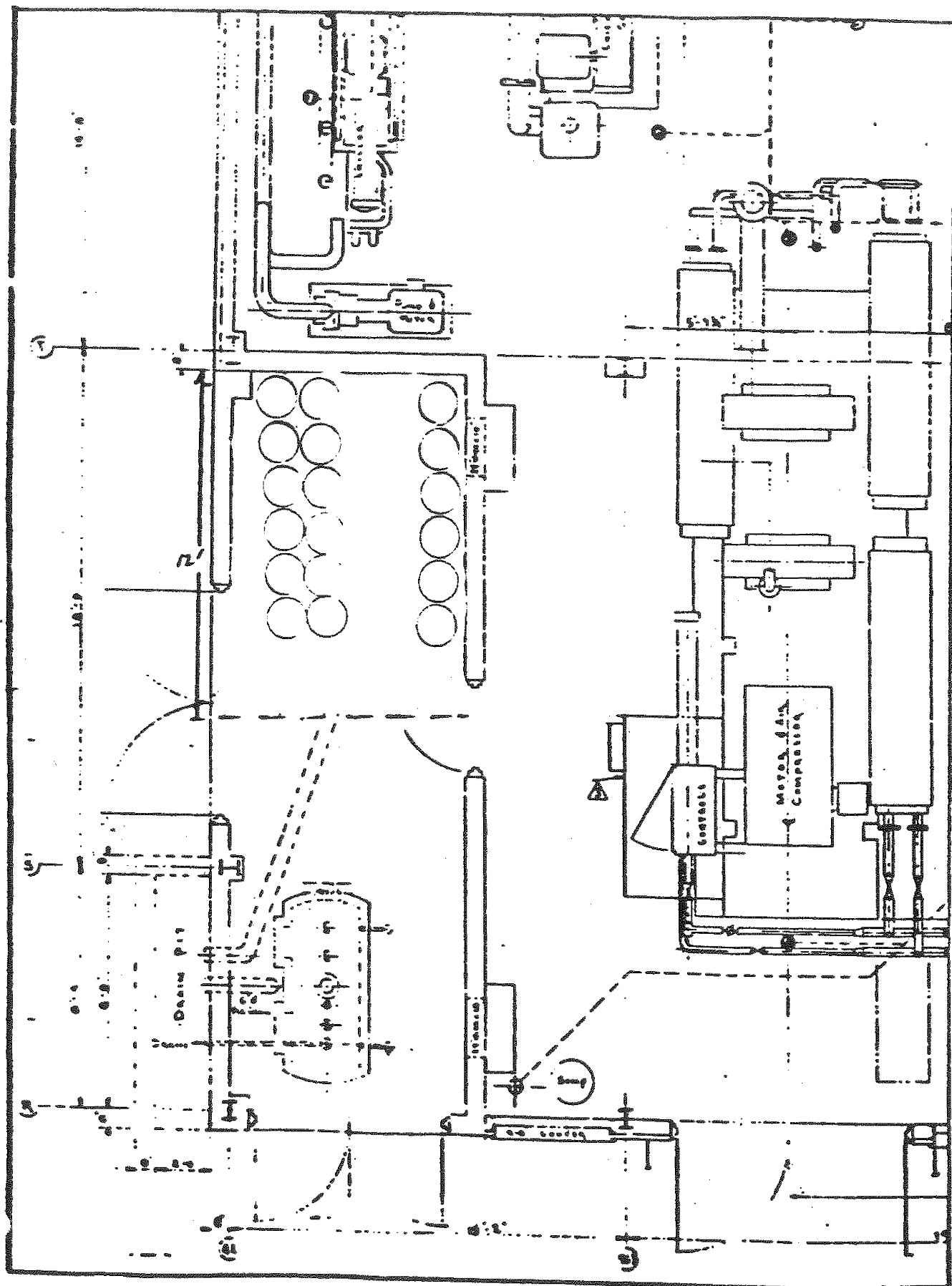


FIGURE 5.

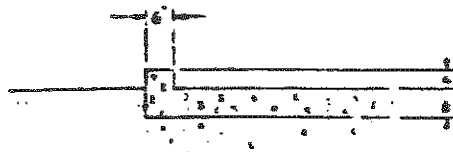
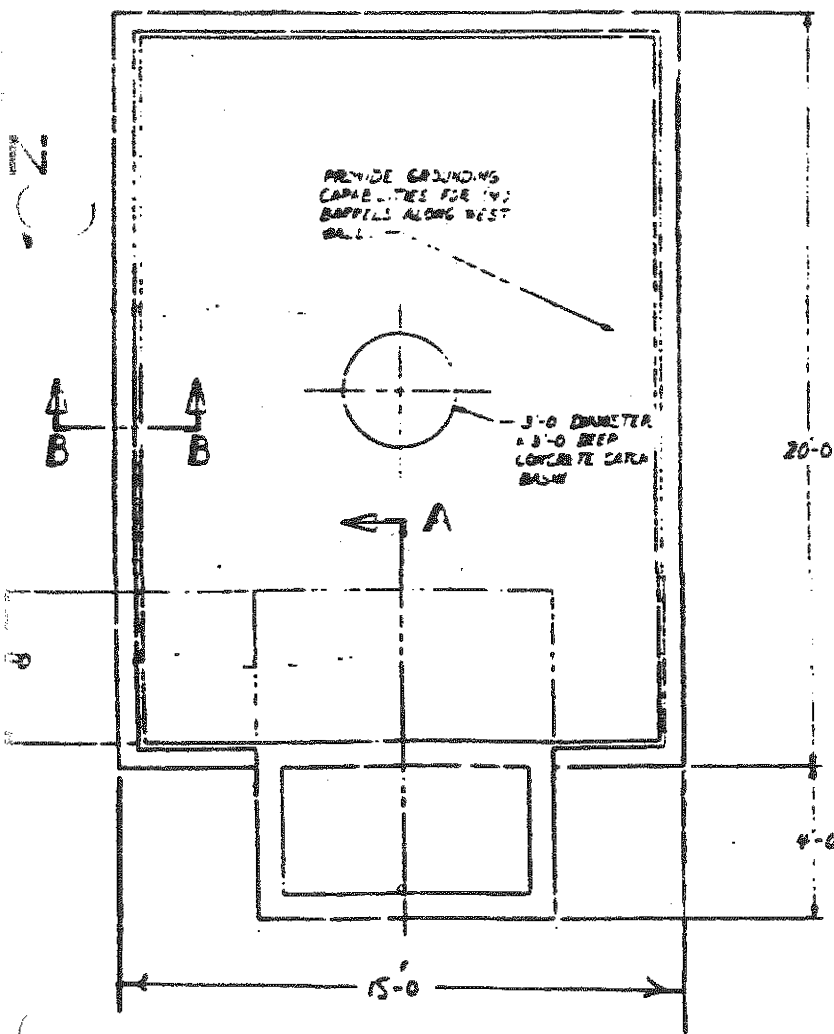
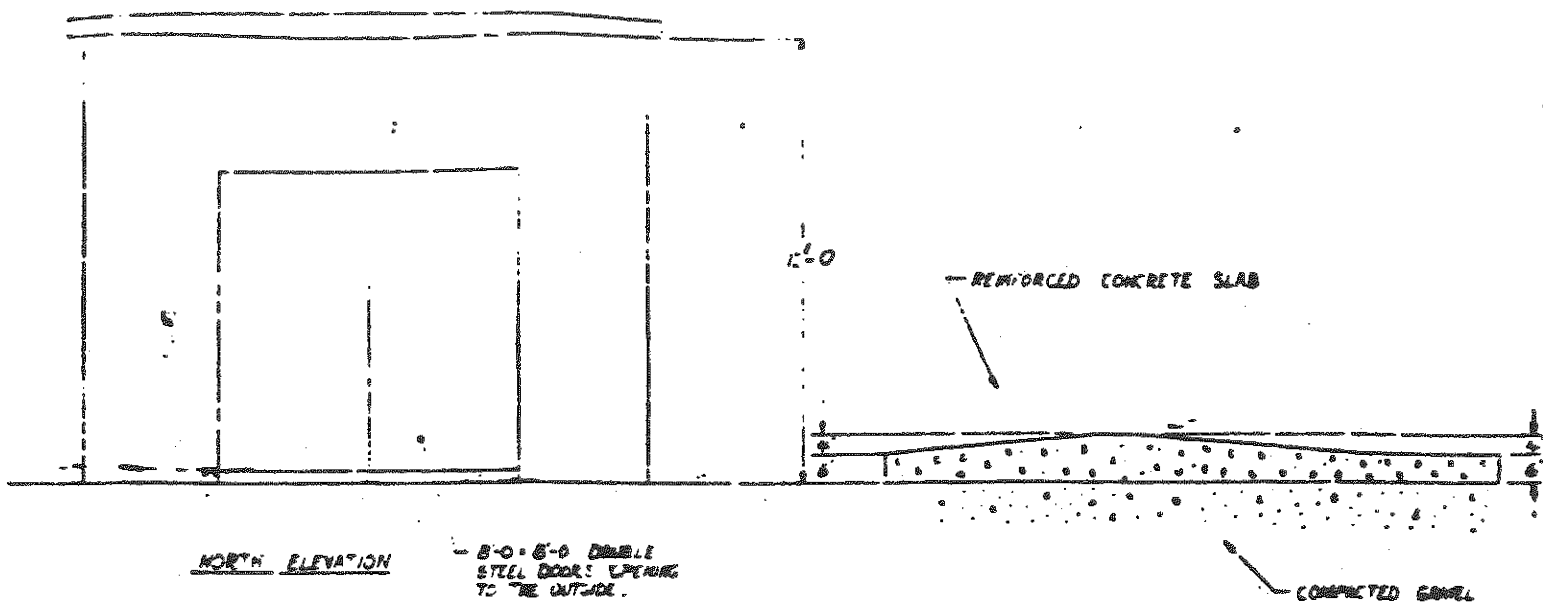






Typical Drum Placement in Storage Area

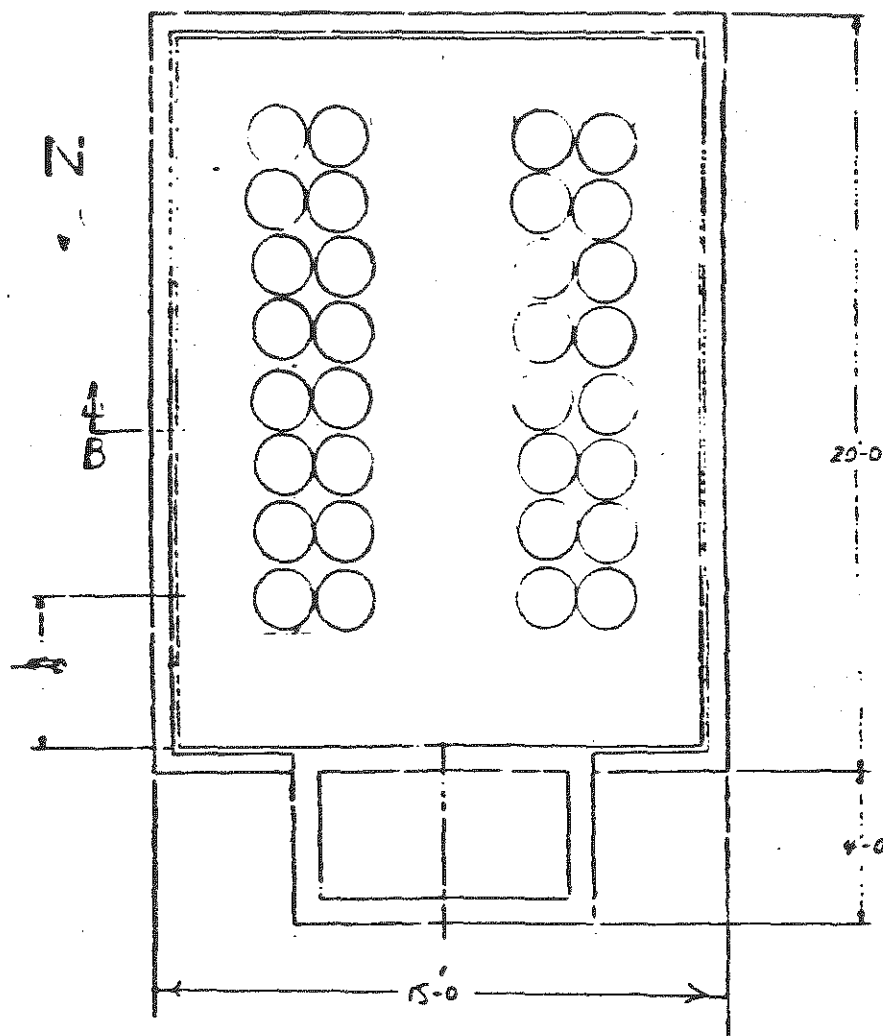
ALCOHOL STORAGE SHED AREA 4



SECTION B-B
SCALE: 1/4" = 1'-0"

ALCOHOL STORAGE SHED AREA 4

FIGURE 5e



Typical Drum Placement in
Storage Area